

Idaho School for the Deaf and the Blind

Evaluation Report
October 2005

Office of Performance Evaluations
Idaho Legislature



Report 05-03

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Idaho School for the Deaf and the Blind

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October 6, 2005

Joint Legislative Oversight Committee
Idaho Legislature

Last March, you directed us to review the Idaho School for the Deaf and the Blind (ISDB). You were interested in knowing more about the school's responsibilities, enrollment characteristics and trends, program costs, and assistive technologies.

Decreased campus enrollment, increased demand for outreach services, and new technologies have placed ISDB at a turning point. Policymakers have the opportunity of deciding what will best serve Idaho's sensory-impaired children. This report provides two directions for your consideration:

- a. Incorporate OPE recommendations into the current method of delivering services
- b. Choose a new method of delivering services

Should policymakers decide to continue with the current method of delivering services, we offer nine recommendations to ensure compliance with statutory requirements, improve enrollment tracking, clarify the school's position on assistive technologies, and develop a plan that addresses the school's rising costs per student.

If policymakers choose a new direction for ISDB, some of our recommendations will still be applicable. Any significant changes should be accompanied by detailed analyses of how well students will be served, fiscal tradeoffs, facility use, and logistical constraints.

We appreciate the cooperation and assistance we received from the Office of the Governor and the State Board of Education. Their written responses to the evaluation are included in the report.

Finally, this study would not have been possible without the full support of ISDB management and staff, school district officials, and parents of sensory-impaired children.

Sincerely,

A handwritten signature in black ink that reads "Rakesh Mohan".

Rakesh Mohan

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Executive Summary

Idaho School for the Deaf and the Blind

The Idaho School for the Deaf and the Blind (ISDB) is at a turning point. Policymakers will need to consider the school's future direction because changes in recent decades have resulted in declining enrollment, rising costs per student, increased demand for regional services, and underutilized campus facilities. Policymakers and ISDB officials have essentially two options:

- a. Maintain the current system of providing services, and implement our recommendations*
- b. Deliver services through a new model*

As discussed in the last chapter of this report, new models for service delivery could include preserving ISDB as a school for either day students or multi-disability students; providing outreach services only; or relocating the school to an urban area where students could take advantage of a wider variety of educational opportunities and services.

Other states have faced similar challenges, and throughout this report we highlight how some of them have addressed those challenges. Any significant change to ISDB's service delivery should be accompanied by detailed analyses of how well students will be served, fiscal tradeoffs, facility use, and logistical constraints.

Background

The Idaho School for the Deaf and the Blind (ISDB) is a state-funded and operated agency serving Idaho's sensory-impaired students. Idaho's State Board of Education serves as ISDB's board of trustees. The campus is located in Gooding, Idaho, and is situated on acreage donated in 1909 by former Governor Frank Gooding. According to the warranty deed, if the land is not used for a state school for sensory-impaired students, or for other state uses, it is to revert back to Governor Gooding's heirs.

ISDB provides services to residential students who stay overnight on campus, day students who attend school and are bused to and from the school daily, and to students and families in their home school districts through regional outreach consultants. Although not required by federal law, most states operate a school

for the deaf and/or the blind. Idaho is one of nine states that serve the two populations at a single school.

Responsibilities Need Clarification

In recent decades, numerous changes have been made in federal laws regarding the education of sensory-impaired students. However, Idaho statutes have not been amended to keep pace with these changes or the expansion of ISDB's outreach services. Therefore, amendment of state statutes and/or ISDB practices is needed to achieve agreement between practice and law.

ISDB Campus Enrollment Is Declining

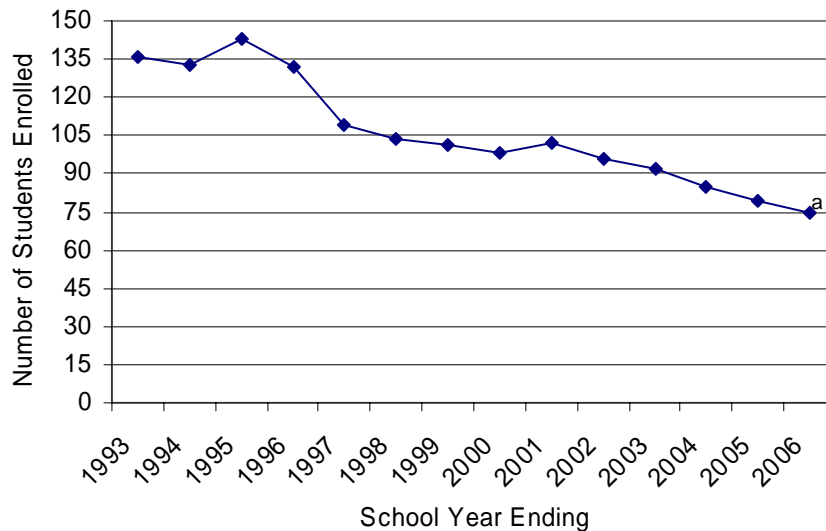
As of September 2005, there were 75 students enrolled in ISDB's campus programs. Enrollment at ISDB's campus has declined in nine of the past ten years, by an average of six students per year (exhibit A). A continued decline at this rate would decrease ISDB's campus enrollment to approximately 60 students within three years. ISDB currently uses less than one-half of its facilities due to this decline in students. Sustainable enrollment is critical to the future of the school; however, school officials have not incorporated enrollment projections into their short- or long-term strategic planning efforts.

State and national indicators show a trend of declining enrollment in schools for the deaf and/or the blind, and consequently, some states have closed their schools. The trend is due in part to an increase of students and children receiving services in their local school districts or in their homes. ISDB serves about 90 percent of its students and children through outreach programs.

Expenditures Have Kept Pace with Inflation, but Costs Per Student Are Rising as Enrollment Declines

ISDB's annual state general fund appropriation accounts for over 95 percent of its total budget, which is \$8.16 million in the current fiscal year. Over the past ten years, ISDB revenues and expenditures have kept pace with inflation. However, ISDB's continued enrollment decline has resulted in a rising cost per student. We estimated ISDB spent about \$82,000 for each residential (overnight) student and about \$59,000 for each day student during the 2004–05 school year. If the decline in enrollment continues at the current pace, the cost per residential student could be \$100,000 within two years.

Exhibit A: Idaho School for the Deaf and the Blind Campus Enrollment, by School Year



^a Enrollment count of 75 students was taken September 20, 2005. All other data points are based on an average of enrollment counts for that year.

Source: Office of Performance Evaluations' analysis of the Idaho School for the Deaf and the Blind enrollment data.

Outreach Services Have Expanded

ISDB provides various outreach services to school districts and families through seven regional offices around the state. This program served an average of 660 students and children during the 2004–05 school year, a 25 percent increase over the past ten years. Although each student or child has an associated case on file that is coded by type and amount of work required, numbers reported to the Legislature treat all cases equally and do not reflect actual workload. Regular assessment of workload would allow ISDB to provide more useful information to policymakers (the State Board of Education and the Legislature).

One of ISDB's more recent outreach efforts is a partnership with the Meridian School District to provide auditory-oral communication instruction to pre-school, kindergarten, and first grade students from Meridian and surrounding districts. ISDB also provides an instructor for a pre-school total communication class that has been functioning for many years. During the 2004–05 school year, these programs served 21 students who have cochlear implants. Cochlear implants are surgically implanted devices that allow individuals to detect sound. Implants are approved for some children as young as 12 months, and successful use of these devices depends greatly on the availability and use of appropriate habilitative services.

ISDB currently provides three instructors plus some classroom aides for these programs, and the district provides classroom space. However, this arrangement, including staff responsibilities, has never been formalized in writing, leaving both parties vulnerable to legal and/or fiscal disputes.

Satisfaction with ISDB Services Is High

Parent and school district survey responses reported high satisfaction with ISDB campus and outreach services. In addition, many school districts reported they were poorly prepared to provide services to sensory-impaired students without the assistance of ISDB. Districts reported a declining demand for residential services, but increasing use of, and desire for regional outreach services. Dissatisfaction with ISDB services comes primarily from parents of children who have cochlear implants and feel more auditory-oral services are needed.

Other States Have Faced Similar Challenges

In recent years, other states' schools for sensory-impaired students have experienced enrollment declines and have adapted and incorporated different approaches to serving students. Michigan, Nebraska, North Carolina, and Wyoming have closed residential schools and focused resources on regional outreach efforts. Some states have entered into partnerships with local school districts to share costs, while others have incorporated new technologies to better serve their students.

In the final chapter of this report, we highlight how ISDB is at a turning point and policymakers can choose essentially one of two options for the school. One option is to maintain the current model of service delivery at the same location and implement our recommendations. The second option is for policymakers to choose a different model of service delivery, possibly at a new location, and implement relevant OPE recommendations. Any new model considered should be accompanied by detailed analyses of how well students will be served, fiscal tradeoffs, facility use, and logistical constraints.

Recommendations

Should policymakers decide to continue with the current service delivery model, we offer nine recommendations to improve services to students and management of ISDB. Some of these recommendations will also be applicable if policymakers choose a new option for ISDB. The recommendations are listed by chapter where additional details are discussed.

Chapter 2

- 2.1: To ensure ISDB is operating according to legislative intent, and to provide accountability for ISDB services and functions, the Legislature should clarify the following areas of ISDB's authorizing statutes:
- Responsibilities
 - Populations to serve and eligibility requirements
 - Service models
 - Compliance with federal requirements
- 2.2: To further clarify ISDB's responsibilities for providing education to sensory-impaired students, ISDB and cooperating agencies should revise their interagency agreements according to federal law and any changes in state statute.
- 2.3: To help ensure all students with sensory impairments in Idaho are provided a free and appropriate public education, the State Board of Education should ensure that school districts follow statutory requirements to annually report the number of sensory-impaired students in their districts to ISDB.

Chapter 3

- 3.1: To assist policymakers in making future decisions about the operation of the Gooding campus, ISDB should develop the following processes:
- Establish an ongoing process for tracking campus enrollment
 - Use enrollment trend data and other available information to regularly project future enrollment
 - Report enrollment trends and projections to the State Board of Education and the Legislature on an annual basis
- 3.2: To improve economic efficiency, ISDB should work with the State Board of Education to develop a plan that identifies opportunities to address rising costs per student and share the results of these efforts with the Legislature. For example, a plan should address appropriate staffing levels for administration, instruction, maintenance, support, student-teacher ratios, number of cottages in operation, and use of the facilities for other purposes.

Chapter 4

- 4.1: To improve ISDB staff's ability to educate parents on communication options for their children, ISDB should take steps to ensure its staff understand the various options and can effectively communicate this information to parents.

- 4.2: To avoid potential legal and financial disputes, ISDB should formalize its arrangement of providing instructors to teach classes within the Meridian School District in an interagency agreement pursuant to Idaho Code § 67-2332.
- 4.3: To better understand resource demands, ISDB should separately measure *caseload* and *workload* and report this information to legislative committees.

Chapter 5

- 5.1: To clarify ISDB's intent to provide auditory-oral training to students with cochlear implants and to address parent dissatisfaction, the Idaho State Board of Education should develop policies and procedures for the school that address program vision and administration, teacher qualifications and training, and curriculum development. Input from parents and ISDB staff should be sought during policy development.

Fiscal Impact and Implementation Timeframe of Recommendations

The costs of implementing recommendations 2.1–3.1 and 4.1–4.3 should be minimal or none because these are typical functions of the Legislature, the State Board of Education, and ISDB. Implementation should be complete by July 1, 2006.

The costs of implementing recommendation 3.2 should be minimal because this process is already underway by the State Board of Education. Results of this recommendation should be shared with the Legislature during the 2006 legislative session and later as more analyses are completed.

The costs of implementing recommendation 5.1 could vary depending on the extent to which the State Board of Education solicits information from parents, ISDB staff, and other experts. Implementation should be in place prior to the start of the 2006–07 school year.

Responses to the Evaluation

We requested and received written response to this report from the Office of the Governor and the State Board of Education. Those responses are included at the end of this report along with our comments.

Acknowledgments

We appreciate the cooperation and assistance we received from the Idaho School for the Deaf and the Blind and the State Board of Education in conducting this study. We also appreciate the input we received from numerous parents, Dr. Jill Beck of Southwest Idaho Ears, Nose & Throat, and the following entities:

- Legislative Audits
- Budget and Policy Analysis
- Office of the Governor, Division of Financial Management
- Office of the State Controller
- Department of Education
- Department of Health and Welfare
- Idaho State University
- US Department of Education
- Idaho Council for the Deaf and Hard of Hearing
- Idaho Commission for the Blind and Visually Impaired
- Idaho Association of School Administrators
- School districts
- Cochlear Corporation

Paul Headlee (project lead), Ned Parrish, and Brook Smith of the Office of Performance Evaluations conducted the study; Courtney Haines, an intern from Boise State University, assisted with research. Rachel Johnstone and Margaret Campbell performed the quality control and desktop publishing, respectively.

Additional assistance was provided by four consultants:

- (1) Tedd McDonald, Ph.D., Associate Professor of Psychology, Boise State University
- (2) Donna Mertens, Ph.D., Professor, Educational Foundations and Research, Gallaudet University
- (3) Kathleen Sullivan, Ph.D., Associate Professor and Director of the Center for Educational Research and Evaluation, University of Mississippi
- (4) Bob Thomas of Robert C. Thomas & Associates. Mr. Thomas is also Principal Management Auditor at the King County Auditor's Office in Seattle, Washington

Chapter 1

Introduction

The Idaho School for the Deaf and the Blind (ISDB) was established almost a century ago to serve sensory-impaired students across Idaho. The school is located in Gooding, Idaho, and provides services to both residential and day students. ISDB also provides regional outreach services to children, their families, and local school districts. Concerns about declining enrollment and rising costs per student to operate the school led lawmakers to request this evaluation. The request for an evaluation also stemmed from concerns that limited services were available for deaf children with cochlear implants.

Overview of the School

The Idaho School for the Deaf and the Blind (ISDB) was established in 1906 under the general direction and oversight of the State Board of Education. The school was originally located in Boise, but following a fire in 1908 that destroyed the school, it was relocated to Gooding, Idaho. Gooding is 102 miles southeast of Boise and has a resident population of about 3,400.

Campus Information

The ISDB campus includes 20 acres of land given to the state by former Governor Frank R. Gooding in 1909.¹ A photocopy of the original warranty deed is in appendix A. According to ISDB officials, subsequent land purchases have increased the total size of the campus to 40 acres.²

The campus has 12 buildings with approximately 227,000 square feet of total usable space. Campus facilities include administrative offices, 36 classrooms (both traditional and vocational), a dining hall and kitchen, an infirmary, six residential cottages, two gymnasiums, an indoor swimming pool, and

¹ The warranty deed specifies the land was given to the state of Idaho for the purpose of building and establishing a school for deaf and blind children, but can also be used for other state purposes. If the land is not used for these purposes, the deed becomes void and the property is reverted back to the former Governor's heirs.

² In addition to the 40 acres on campus, ISDB also owns a 40 acre parcel of land off campus on the outskirts of Gooding. To date, ISDB has leased this additional property for agricultural purposes.

maintenance facilities. The campus also includes several buildings that receive minimal use or are leased out for other public purposes.

ISDB Services

ISDB provides educational services to students who are hearing or visually impaired, as well as to children with multiple handicaps who also have a sensory impairment. These are low-incidence disabilities.³ In Idaho, sensory-impaired students made up about 1.5 percent of all students receiving special education services from public schools during the 2003–04 school year.

The Gooding campus serves both residential and day students from preschool to age 21. During the 2004–05 school year, ISDB served an average of 80 students, including an average of 43 students living on campus.⁴ Residential students (students living on campus) live at the school during the week and return home on the weekends. Day students (students living at home and attending the school during the day) are transported to the school on a daily basis from nearby communities representing 11 school districts. A more detailed discussion of campus services is provided in chapter 3.

ISDB also serves sensory-impaired children from around the state through its regional outreach program. During the 2004–05 school year, an average of 660 children were served statewide. Outreach consultants and instructors are located in seven regional offices. These consultants work with infants and toddlers, preschool and school-age children, and their parents. Outreach consultants also work cooperatively with school district personnel and staff in the Department of Health and Welfare’s Infant Toddler Program. Additional information about ISDB’s outreach services is provided in chapter 4.

Other States

We found 42 states operate either a school for the deaf or a school for the blind. Nine of these states, including Idaho, serve *both* hearing- and visually-impaired students at the same school. States without a state-operated school have either closed their schools, such as Nebraska and Wyoming, never had a school, such as Nevada, or rely on private schools for these services.

³ Sensory impairments, autism, orthopedic impairments (e.g., cerebral palsy and muscular dystrophy), moderate and severe cognitive disabilities, traumatic brain injuries, and multiple disabilities are all considered low-incidence disabilities. Nationally, students with these disabilities make up approximately 10 percent of all students with disabilities in schools. High-incidence disabilities include learning disabilities, mild mental disabilities, Attention Deficit Hyperactivity Disorder (ADHD), and emotional disabilities or behavior disorders.

⁴ As of September 20, 2005, enrollment had dropped to 75 students including 37 residing on campus. Campus enrollment can fluctuate somewhat throughout the year.

Many states offer outreach services. Frequently, these services are provided by staff affiliated with state schools for the deaf and/or blind. Among Idaho's neighboring states, Montana, Oregon, Utah, and Washington, offer outreach services through state school staff. In Oregon and Wyoming, outreach services are also available through service contracts with their state departments of education.

Budget and Staffing

ISDB's funding and staffing levels have remained fairly constant over the past ten years. As shown in exhibit 1.1, the school's annual appropriations increased from \$5.98 to \$8.16 million during fiscal years 1997 through 2006. However, after adjusting for inflation, actual funding for the agency has changed little (see exhibit 1.2). Similarly, staffing levels at ISDB remained relatively flat during fiscal years 1997 through 2006. During this ten-year period, the number of authorized full-time positions increased slightly, from 119.5 in fiscal year 1997

Exhibit 1.1: Idaho School for the Deaf and the Blind Annual Appropriations, by Fiscal Year

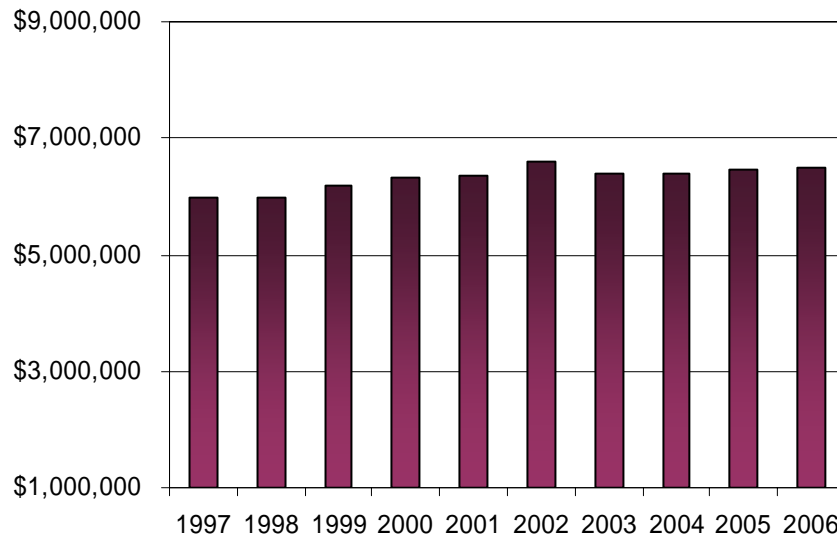
<u>Fiscal Year</u>	<u>State General Funds</u>	<u>Dedicated Funds^a</u>	<u>Federal Funds</u>	<u>Total Appropriation^b</u>
1997	\$5,686,700	124,100	170,800	\$5,981,600
1998	\$5,740,500	198,500	171,000	\$6,110,000
1999	\$6,081,400	249,400	111,000	\$6,441,800
2000	\$6,372,300	279,100	117,000	\$6,768,400
2001	\$6,716,300	208,100	116,000	\$7,040,400
2002	\$7,187,500	304,400	117,100	\$7,609,000
2003	\$7,051,500	290,100	127,100	\$7,468,700
2004	\$7,183,600	304,600	127,100	\$7,615,300
2005	\$7,505,500	241,600	127,100	\$7,874,200
2006	\$7,721,700	316,800	117,100	\$8,155,600

^a Includes revenue from endowment earnings, state technology and substance abuse prevention grants, rent paid for the use of school facilities, and donations.

^b Appropriations include supplementals, holdbacks, and special one time appropriations, such as funding for the 27th pay period in fiscal year 2006.

Source: Office of Performance Evaluations' analysis of data from legislative Budget and Policy Analysis' annual *Legislative Fiscal Reports*.

Exhibit 1.2: Idaho School for the Deaf and the Blind Annual Appropriations Adjusted for Inflation, by Fiscal Year

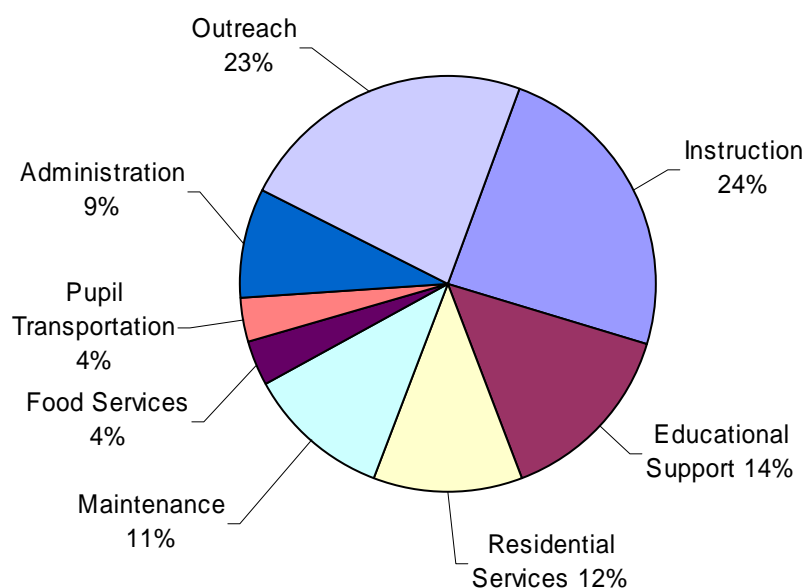


Source: Office of Performance Evaluations' analysis of data from legislative Budget and Policy Analysis, *Legislative Fiscal Reports*, and the US Department of Commerce, Bureau of Labor Statistics, Consumer Index.

to 121.5 in fiscal year 2006. As of September 2005, there were four positions vacant (one campus instructor, two outreach consultants, and a psychologist). Unlike school districts that are funded partly from local taxes, ISDB is a state agency and receives all of its funding through the annual state appropriation process. Most of ISDB's funding has come from the state general fund. In fiscal year 2006, general fund dollars accounted for 95 percent of the school's \$8.16 million appropriation. The remaining five percent of agency funding came from federal grants and endowment earnings.

Exhibit 1.3 is an overview of how ISDB funding was used in fiscal year 2005. Expenditures are divided into eight categories that describe key functions ISDB performs. Roughly 70 percent of total expenditures were devoted to operations at ISDB's Gooding campus. These expenditures include costs for instruction, educational support, residential services, maintenance, food services, and pupil transportation. The largest share of these expenditures (24 percent of total expenditures) went to instruction, which includes costs for teachers and aides who work directly with students. Outreach program costs accounted for 23 percent of total expenditures in fiscal year 2005. Approximately nine percent of total expenditures were for general agency administration.

Exhibit 1.3: Idaho School for the Deaf and the Blind Expenditures by Type, Fiscal Year 2005



Note: Percents do not sum to 100 due to rounding.

Source: Office of Performance Evaluations' review of the Idaho School for the Deaf and the Blind expenditure data from the Statewide Accounting and Reporting System (STARS).

Legislative Interest

In March 2005, the Joint Legislative Oversight Committee directed the Office of Performance Evaluations (OPE) to conduct an evaluation of the Idaho School for the Deaf and the Blind. The request for the evaluation came from lawmakers who raised concerns about declining enrollment and rising costs per student at the school. Lawmakers requesting the evaluation also cited parent concerns that relatively few resources were devoted to outreach services and to children with cochlear implants.

During the past legislative session, members of the Joint Finance-Appropriations Committee (JFAC) also expressed concerns about ISDB operations. In the school's fiscal year 2006 appropriation bill, JFAC included language requiring the State Board of Education to examine enrollment trends and staffing levels at ISDB. The board has established a committee to examine these issues, and the committee plans to use this report in preparing its final recommendations. A copy of the project scope, designed to address legislative concerns, is in appendix B.

Evaluation Methodology

A key element of our work was to seek input from stakeholders, and we used various research methods to accomplish this:

- Surveyed all school district special education directors and most of the parents of children being served by ISDB
- Spoke with representatives of state advocacy organizations
- Spoke with many ISDB staff members and conducted group interviews with teachers and outreach consultants

As part of the evaluation, we reviewed student enrollment data, staff caseloads, and agency expenditures to understand trend patterns over the past 10 to 15 years. We also gathered information about services to sensory-impaired students in other states and reviewed literature regarding education of sensory-impaired children. More details of the methods used in this evaluation are discussed in appendix C.

Report Organization

Chapter 2 examines ISDB's responsibilities for serving sensory-impaired children. It identifies instances that statutory changes are needed to address inconsistencies between current agency practices and established legal requirements.

Chapter 3 presents information about the services ISDB provides to students on its Gooding campus, and school district and parent satisfaction with these services. It also discusses the impact of declining enrollment on the cost of services and the use of campus facilities.

Chapter 4 provides information regarding ISDB's regional outreach program and the growing demand for these services. It also discusses the need to improve caseload and workload management within the program.

Chapter 5 focuses on cochlear implants and the potential they offer to improve some students' educational performance and ability to function effectively in mainstream classrooms. The chapter also identifies the need to expand auditory-oral services for children with cochlear implants.

Chapter 6 summarizes our study's conclusions and presents options that could be considered to address declining campus enrollment and rising costs per student.

Chapter 2

ISDB Responsibilities

Federal law governing the education of sensory-impaired students has undergone a number of changes in recent decades. However, responsibilities for the Idaho School for the Deaf and the Blind (ISDB) outlined in state law have not kept pace with these changes. Following directives of the State Board of Education, ISDB provides regional outreach services to school districts even though state statutes do not authorize such services. The Legislature should clarify in statute ISDB's responsibilities to allow alignment of ISDB practice with state law.

This chapter provides background information on federal and state requirements for the education of sensory-impaired students and addresses the following questions:

- What are ISDB's current responsibilities?
- Are these responsibilities consistent with state and federal laws, State Board of Education policies and procedures, and interagency agreements?

State Statutes Differ from Current Practice and Federal Law

Idaho Code § 33-3407 specifies ISDB is to serve “[a]ll children between the ages of six (6) and twenty-one (21) years who are too deaf or too blind to be educated in the public schools...” This section of statute also allows for children younger than six years of age to be admitted to ISDB with approval from the State Board of Education.

However, ISDB currently serves a much larger population of students than authorized in statute. The State Board of Education's policies and procedures direct ISDB to provide:

- Educational opportunity for every sensory-impaired child in Idaho
- Preschool instruction in the home
- Consultive and program assistance to local education agencies (outreach services in ISDB's seven regions around the state)

Federal Requirements

Federal laws governing the provision of education to sensory-impaired students are now several decades old. Amendments and developments of these laws have solidified rights of students and their parents or guardians, as well as established a framework of important concepts to guide states.

Section 504. This section of the Rehabilitative Act of 1973 is a federal civil rights statute that does not allow discrimination on the basis of disability by any program or activity receiving federal funds. It affects all operations of state and local educational agencies, such as the provision of services, accessibility, evaluations and transition plans, employment, and other aspects of compliance.

Free Appropriate Public Education (FAPE). This concept guarantees the following to children with disabilities:^a

- Special education and other services at no cost
- Education in accordance with established state standards
- Meet the needs of the student's individualized education program

Least Restrictive Environment (LRE). Established in the Individuals with Disabilities Education Act (IDEA), children with disabilities should be educated as much as possible with children who are not disabled, preferably in a "regular educational environment." Additionally, "each public agency is" required to provide a continuum of placements for educating children, chosen for each child on an individual basis, ranging from the least restrictive to the most restrictive.^b

Individualized Education Program (IEP). The Individual with Disabilities Education Act established the requirement for children with disabilities to have an IEP or written statement of educational and transitional needs, goals, placement decision, and other education decisions agreed upon by parents, teachers, and other service providers. States must ensure that IEP teams determine the services a child should receive, as well as where a child is educated and that these plans are implemented.

Procedural Safeguards. IDEA requires state and local educational agencies to establish procedural safeguards to protect the rights of children and families in the IEP process, such as informed consent, confidentiality, and parental involvement. Notification of these rights must be provided to parents/guardians in their native language in "easily understood prose" and in the child's "mode of communication."^c

^a *Education for All Handicapped Children Act of 1975*, Pub.L. 94-142, 20 USC § 1401 (8) FAPE (1975).

^b The least restrictive environment for a hearing-impaired child who uses sign language may be a residential school, such as ISDB, because it provides an environment where everyone uses sign language so communication is less restricted than in a mainstream classroom. This is supported by guidance on the least restrictive environment offered by the US Department of Education. Fed. Reg. 57.211 (1992).

^c Celeste Johnson, *How the Individuals with Disabilities Education Act (IDEA) Applies to Deaf and Hard of Hearing Students* (Washington, D.C.: Laurent Clerc National Deaf Education Center, Gallaudet University, 2000), 23.

- Information and training to parents, guardians, and family members of sensory-impaired students
- Research studies and projects
- Community and continuing educational opportunities¹

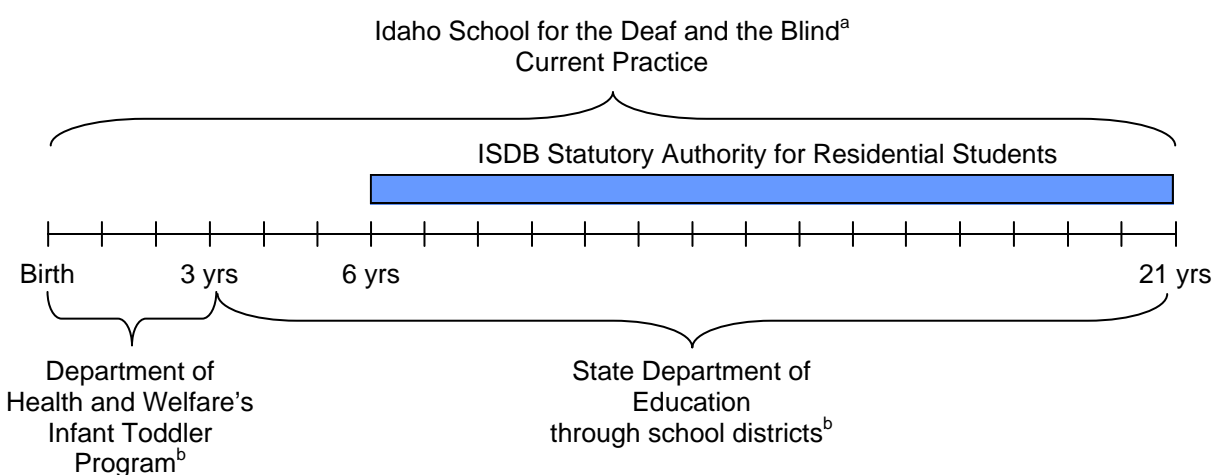
In addition, although outreach services are not authorized in statute, the Legislature has earmarked funding specifically for outreach services for fiscal year 2006.²

Exhibit 2.1 shows that ISDB currently provides services to students and children birth to age 21 while the agency's statutes authorize services for students ages six to 21 in a residential setting. This exhibit also shows the responsibilities of other state agencies.

¹ State Board of Education, *Policies and Procedures*, Section IV Agency Affairs D, Idaho School for the Deaf and the Blind, <http://www.idahoboardofed.org/policies/i/a.asp>.

² SB 1210, 58th Leg., 1st Sess. (Idaho 2005). The bill designated \$1.6 million for outreach services in fiscal year 2006.

Exhibit 2.1: Responsibilities of State Agencies in Providing Education to Sensory-Impaired Students



^a Provides services to assist in educating sensory-impaired students.

^b Required by federal law to provide educational services.

Source: Office of Performance Evaluations' interpretation of Idaho Code and current practice of the Idaho School for the Deaf and the Blind, the Department of Health and Welfare, and the State Department of Education.

To align state statutes, federal laws (see page 8), and current ISDB practice, at a minimum four issues should be addressed:

Age of Students. Idaho Code authorizes ISDB to provide services to students from the ages of six through 21 years old. However, an interagency agreement between the Idaho Department of Health and Welfare’s Infant Toddler Program and ISDB specifies that ISDB “is responsible for services to children and youth, birth to twenty-one, whose primary disability is vision and/or hearing loss.”

Eligibility of Students. ISDB’s interagency agreements require it to provide services to children whose “primary disability” is a sensory impairment. However, the school has since dropped the use of this criterion for determining service eligibility because it considers the term debatable when there are multiple handicapping conditions. ISDB officials told us they consider other “secondary factors” when making placement decisions for students, including dysfunctional family issues, mental retardation, additional learning disabilities, and lower academic progress from lack of services.

Legal Responsibility. A recent parent complaint has raised questions whether ISDB has responsibilities for providing a free and appropriate public education to students placed at the Gooding campus. The US Department of Education, Office of Civil Rights, is currently investigating the complaint.

Idaho Code § 33-2002 places responsibility on public school districts for educating children with disabilities. However, Idaho statutes are silent about ISDB’s responsibility for students placed at the Gooding campus.

Federal law and regulations charge state education agencies with primary responsibility for supervision of public elementary and secondary schools.³ For example, the state education agency is responsible for ensuring individualized education programs are developed and implemented.⁴ Federal law and regulations also place responsibility for providing students a free and appropriate public education on local education agencies, public charter schools, state schools for children with deafness or blindness, and other public agencies providing special education to students with disabilities.^{5, 6}

Technical guidance we received from the Office of Civil Rights suggests ISDB shares the responsibility of providing a free and appropriate education to students enrolled in its programs. Office of Civil Rights staff told us that recipients of federal financial assistance operating public education programs have a responsibility to provide qualified handicapped students within their

³ 20 USC § 1401(28)

⁴ 34 CFR § 300.341

⁵ 20 USC § 1412(a)(11)(b)

⁶ 34 CFR §§ 300.1–2

jurisdiction a free and appropriate public education.⁷ ISDB has received on average \$130,000 of federal financial assistance per year over the past 10 years.

Outreach Services. ISDB provides regional outreach services to students attending public schools in Idaho. This practice is outside of ISDB’s authorizing statute, which implies education is to take place in a residential setting (campus services).

Other States’ Statutes May Provide Guidance for Idaho

In our review of other states’ statutes, we identified some common components that may assist lawmakers to clarify ISDB’s responsibilities as outlined in Idaho Code. These components fall into three categories: eligibility, services provided, and funding and tuition.

Eligibility

Three other states’ statutes, which contain language about student eligibility for education by state schools for the deaf and the blind, provide examples for possible revision of Idaho Code.

Colorado’s statute specifies that educational services are to be provided to “every blind and every deaf citizen of the state” as long as they meet the board of trustees’ enrollment criteria or if they have a “physical or mental condition which would render his or her instruction impractical.” Services are provided to students who are deaf or blind or students with multiple disabilities if there are a “sufficient number of such students to warrant the establishment of a class.”⁸

Oregon’s policy allows students to attend its school for the deaf and the blind “only when local programs are unable to provide a free and appropriate public education consistent with the needs of the students as identified in the students’ individualized education program.”⁹ Its administrative rules also govern the specific level of hearing and vision loss required for services from the state school.

South Dakota’s statute states “[a]ll persons under twenty-one years of age, whose hearing impairment precludes successful educational benefits of public schools, who are residents of the state, and capable of receiving instruction” are eligible to receive services from the state school for the deaf.¹⁰ A hearing loss of 70 decibels or more is required for hearing-impaired students. Visually-impaired

⁷ 34 CFR § 104.33

⁸ COLO. REV. STAT. §§ 22-80-109, 113 (2004)

⁹ OR. ADMIN. R. 581.016.0526.1 (2005)

¹⁰ S.D. Codified Laws § 13-62-6 (2004)

students must have a visual acuity of 20:70 or less with correction, and the vision impairment must have an educational impact.

Services Provided

Some states' statutes specify differing levels of services provided by state schools for the deaf and the blind. The Legislature may consider specifying in Idaho Code the level of services they wish ISDB to provide.

Colorado's school for the deaf and the blind has the responsibility to not only provide a residential school, but to serve as a resource for school districts and agencies. Some of the services the school is required to provide are outlined in statute and include assessment and identification of educational needs, special curricula, equipment and materials, and staff development.

Montana's statutes establish the school for the deaf and blind as a residential and day school, as well as a school that provides outreach services. The school is to provide consultative services and serve as a resource to parents and other programs.

Washington's school for the deaf and its school for the blind are both responsible for providing residential services as well as regional statewide consulting. For the school for the deaf, this service includes evaluations, teacher training workshops, partnering with other programs in the state, and other outreach programs. For the school for the blind, this service includes consultations to districts, Braille access, teacher training, local partnering with other organizations, as well as operating a local day preschool and an instructional resource center.

Funding and Tuition

Of the state institutions we reviewed, all receive funding from their respective state governments. Some states authorize their state schools to charge tuition to districts that send their students to the school or assess fees for services provided to districts.

Oregon's statutes require local school districts that send their students to the state school for the blind to either provide funding for classroom aides, or directly provide staffing, if required in the student's individualized education program. The school has agreements in place with every district to define district responsibilities for student services.

South Dakota's school for the deaf provides some services to students at no cost to school districts. However, if the student's individualized education program calls for services the state school does not provide, the district is required to pay for those services. South Dakota's school for the blind is authorized by statute to charge local districts for services provided, but currently does not do so.

Washington's school for the deaf and local school districts are beginning a new program related to the school's regional consulting services. Through this program, school districts will be able to purchase up to 80 percent of a regional consultant's time for their own use. Because this is a new program, there has not been an assessment of how well it is working.

Statutes Require ISDB to Maintain a Count of Sensory-Impaired Students

Idaho Code requires school districts to annually report the number of hearing- and visually-impaired students in their districts to ISDB.¹¹ However, in practice, school districts have not been reporting this information directly to ISDB. Instead, districts submit information to the State Department of Education. According to ISDB officials, they only receive a summary report of this information when they ask the department.

The ISDB interim superintendent told us that having data from a list or registry, such as ones maintained by other states, would enable them to ensure all students with sensory impairments in Idaho are appropriately served. Schools in Colorado, Montana, New Mexico, and Washington maintain a list or registry of students, or have some method of tracking students with sensory impairments.

Recommendations

- 2.1: To ensure ISDB is operating according to legislative intent, and to provide accountability for ISDB services and functions, the Legislature should clarify the following areas of ISDB's authorizing statutes:
- Responsibilities
 - Populations to serve and eligibility requirements
 - Service models
 - Compliance with federal requirements
- 2.2: To further clarify ISDB's responsibilities for providing education to sensory-impaired students, ISDB and cooperating agencies should revise their interagency agreements according to federal law and any changes in state statute.

¹¹ IDAHO CODE § 33-3408

2.3: To help ensure all students with sensory impairments in Idaho are provided a free and appropriate public education, the State Board of Education should ensure that school districts follow statutory requirements to annually report the number of sensory-impaired students in their districts to ISDB.

The costs of implementing recommendations 2.1–2.3 should be minimal or none because these are typical functions of the Legislature, the State Board of Education, and ISDB. Implementation should be complete by July 1, 2006.

Chapter 3

Campus Services and Enrollment

The Idaho School for the Deaf and the Blind (ISDB) offers many educational and support services at its Gooding campus, which serves both residential and day students. Although satisfaction with campus services is generally high, enrollment at the campus has declined significantly over the past 15 years, resulting in facilities that are now being used at less than one-half capacity. As campus enrollment has decreased, the school's cost per student has risen steadily. During the past fiscal year, ISDB spent about \$82,000 per student to serve students who reside on campus and \$59,000 per student for those who receive day services.

Further cost increases are likely if campus enrollment continues to decline. Because of declining enrollment and increased costs, policymakers face difficult decisions about the school's future and the delivery of services to sensory-impaired students. Other states are also struggling with these issues and have taken various steps in response to these trends.

ISDB's campus programs offer services to sensory-impaired students from across Idaho. The school is one of a range of placement options that individualized education program teams in local school districts can consider in their efforts to serve students with hearing and/or visual impairments. This chapter addresses the following questions:

- What residential services does ISDB provide?
- What are the enrollment characteristics and trends within ISDB's residential programs?
- What are the national enrollment trends for residential settings?
- What ISDB programming exists to prepare students for life following graduation?

Campus Provides Services to Both Residential and Day Students

ISDB provides educational and support services to both residential and day students at its Gooding campus.

Student Population

The school serves students from preschool to age 21. During the 2004–05 school year, ISDB served an average of 80 students on its Gooding campus. About two-thirds of these students were classified as deaf or hearing impaired. The remaining students were blind or visually impaired (21 percent), or had multiple handicaps (13 percent). Students attending ISDB must first be referred to the school by local individualized education program teams that are responsible for assessing student needs and determining appropriate placement.

Teachers and school administrators report students now served at the school are generally more challenging than in the past. They indicated that more students are coming to the school after first being served in the public school system, and are arriving with language and academic deficits. ISDB's principal and curriculum director believe these learning issues have contributed to a decline in student achievement levels. Scores from the Test of Achievement and Proficiency, which is given to tenth and eleventh graders each year, show marked declines in test scores for reading, language, and math over the past 15 years.

Educational and Support Services Offered

Classroom instruction is offered by 17.5 full-time equivalent teachers and 11 classroom aides.¹ The academic program follows the state of Idaho's course of study and meets state graduation requirements. Students can progress at their own rate of learning, and instructional modifications and other accommodations are made when called for in students' individualized education programs.

ISDB also offers a specialized educational program called Learning, Experiencing, Achieving by Doing (LEAD) that is intended to help prepare students to enter the work force "at whatever level they are capable of mastering." After-school programs are available to assist both elementary and secondary students with homework assignments and to aid student achievement.

The school also offers other specialized services:

Interpreting. ISDB employs five full-time sign language interpreters to facilitate communication among campus students, teachers, and staff. These staff also provide interpretive services to ISDB students enrolled in mainstream classes in the Gooding School District.

¹ ISDB has two additional teaching positions. One of these positions is currently vacant and the employee in the other is on military leave. Classroom aides include 5 permanent and 6 temporary staff.

Audiology. The school has a full-time audiologist who conducts annual student hearing tests, maintains assistive technology (e.g., hearing aids, cochlear implants, FM systems), and provides auditory training. The audiologist also conducts weekly clinics for students served by local school districts.

Speech-language pathology. ISDB has a full-time speech and language pathologist who assesses student speech functioning levels, provides speech therapy services, assists teachers in implementing speech in the classroom, and provides auditory training.²

Physical and occupational therapy. The school contracts for physical and occupational therapy services when called for in students' individualized education programs.

Counseling and psychology. ISDB employs a full-time school counselor with sign language skills. In addition, prior to the current school year, the school also employed a psychologist experienced in working with sensory-impaired children. The school is now relying on contract services until the vacancy is filled.

Transition assistance. The school employs two full-time specialists to assist students as they prepare to transition out of school.³ The on-campus specialist assists students with the development of vocational, job search, and independent living skills called for in their individualized education programs. The post-secondary specialist has an office at the College of Southern Idaho and provides instruction and assistance with college, technical school, or job training. According to ISDB staff, 33 students from ISDB and school districts participated in the post-secondary program during the 2004–05 school year.

Residential Services Available

Students residing on campus live in one of six cottages that are designed to provide a homelike environment. Each cottage can comfortably accommodate 12 students and includes a living room, a study room, a full kitchen, laundry facilities, and a staff office. Cottages are equipped with Telecommunication Devices for the Deaf (TDDs), computers, and other necessary equipment. Students are grouped together by age, gender, and disability.

Staff are present in the cottages whenever students are not attending classes. Each cottage has a cottage supervisor who works afternoon and evening hours and a cottage assistant who works at night and in the mornings. Additional staff

² This is a new position. In prior years, ISDB had used contractors to provide speech therapy services.

³ 20 USC § 1401(30) and 20 USC § 1414(d)(1)(A)(vii)(I)–(III) require a transition plan be developed for each disabled student age 14 or older. The plan identifies goals for the student and services needed to help the student achieve these goals.

may be assigned to cottages based on student needs. Nursing staff and security are provided during the evenings, and evening meals are delivered to the cottages by food service staff.

Students residing in the cottages return home each weekend. ISDB provides bus transportation to the Boise area and to Pocatello and Idaho Falls. The school covers the cost for parents to pick up their children at designated stops, and for students from northern Idaho to fly home each weekend. During the 2004–05 school year, ISDB served two students who required transportation to northern Idaho. ISDB administrators reported that it costs less to return students to their homes on weekends than to staff the cottages and provide meals.

The school also serves day students from 11 nearby school districts. These students receive the same educational and support services as residential students. ISDB operates six daily bus routes to transport day students to and from school. Buses are driven by ISDB maintenance personnel who also have other work responsibilities. Each bus has at least one bus monitor on board to ensure child safety and help with communications.

Satisfaction with ISDB Campus Services Is Generally High

As part of the evaluation, we surveyed parents of ISDB students and school district officials to gain an understanding of their level of satisfaction with ISDB campus services. In general, both groups expressed high levels of satisfaction. We also conducted group interviews with campus teachers and aides to obtain their input about the school.

Parent Satisfaction

Parents of students attending ISDB's Gooding campus generally gave high marks to the school. More than three-quarters of the parents of campus students responding to the survey said overall they were satisfied with the services ISDB has provided to their children. More than 80 percent of the parents responding to the survey felt the school has teachers with the expertise and skills needed to work with their children, has adequate support staff and facilities, provides services called for on their children's individualized education program, and treats students fairly regardless of their impairment. The following comments by parents provide examples of their general satisfaction:

My son has attended ISDB since he was 3 years old, he now is 13. I have great respect for this school and staff.

Because my daughter is blind and partially deaf, she has special needs. ISDB has taken the time and effort to look for alternative ways to help her.

Speech therapy is outstanding. My daughter is speaking so much more since attending ISDB. The one-on-one teaching...should not go without praise.

At ISDB my son isn't just a number, he is one of the kids. [He is] known by everyone, from the superintendent to the janitor. He is in the multiple handicapped class. Just because he has more than one challenge doesn't mean they treat him differently. They work at his ability level. They always have my son's best interest at heart.

The cottage staff has impressed me by keeping me informed of anything that goes on with my child.

All of the services are wonderful. My daughter loves her school, teachers and friends.

I feel that some of the teachers don't have the skills or the "want" to teach the kids what they need to know to be ready for college. Kids are taught "down" to the lowest level of children in the class.

My child recently had a cochlear implant. She needs more attention on voice and speech.

School District Satisfaction

Of the school districts who reported using ISDB residential or day student services, more than 90 percent said they were very satisfied or somewhat satisfied with the services provided. Nearly three-fourths of respondents felt ISDB provides services in accordance with the interagency agreement the school has entered into with the State Department of Education (the remaining districts were unsure whether services were provided in accordance with the agreement).

One issue of concern from respondents had to do with district participation in individualized education program meetings held at the Gooding campus. Four of the 29 districts with students at ISDB responding to the survey reported they had not been invited to individualized education program meetings and 10 districts reported they rarely or never attend these meetings when invited.⁴

School district comments about ISDB campus services provide insight to their general satisfaction:

⁴ District notification of and participation in individualized education program meetings held at the Gooding campus were identified as areas needing improvement in the State Department of Education's 2005 review of ISDB's compliance with federal Individuals with Disabilities Education Act requirements. The review also noted the need for ISDB to include a statement of the transition service needs within the student's individualized education program. ISDB officials report that corrective actions have been taken to improve notification and participation of districts in the development of student individualized education programs.

I have found ISDB personnel to be professional and easy to work with. We have a good working relationship.

The only reason I marked somewhat satisfied is because I believe ISDB has a very limited amount of resources, which can be a detriment to students. However, I believe that they do a much better job in a much more cost effective manner than if each individual school had to provide services directly.

I feel they are providing a good education.

ISDB coordinates and collaborates with our district regularly. We have an excellent working relationship with them.

Notification of meetings is poor—last minute—causing me the inability to attend.

Campus Teacher Input

During the evaluation, we conducted individual and group interviews of campus teachers. We asked a variety of questions including whether they thought the school was headed in the right direction. There was no consensus on this question among the 14 teachers and classroom aides we interviewed in group settings. Teachers generally seemed to be unsure about what the future holds for ISDB and appeared to take a wait and see attitude. One teacher we interviewed individually believed the school was on the right track and said “we now have a no-nonsense principal.”

Teachers were asked to identify the major strengths of the campus program. Several common themes emerged in their responses. They felt strongly that low student-to-teacher ratios at the school allow them to provide individualized instruction that meets the needs of each student attending ISDB. They also believe the school has highly trained faculty and support staff who can work effectively with sensory-impaired students because of their specialized education and experience.

Weaknesses cited by teachers included difficulties recruiting and retaining trained staff due to low pay. Teachers in each of the groups we met with also felt the lack of communication between school administrators and teachers/staff was a problem. Concerns were also voiced in each of the three groups with management’s current focus on running the school like a business. Many of the teachers and staff participating in the group interviews felt left out and did not feel they had a voice in important decision-making processes.

ISDB Campus Enrollment Is Declining

Although satisfaction with campus services has generally been high, there has been a steady and significant decline in enrollment at ISDB’s Gooding campus

over the past fifteen years. During roughly the same period, the number of sensory-impaired students served in public residential schools has also declined nationwide. Several factors, such as federal policies requiring disabled students to be educated in the least restrictive environment and expansion of services available in local school districts, appear to contribute to this trend.

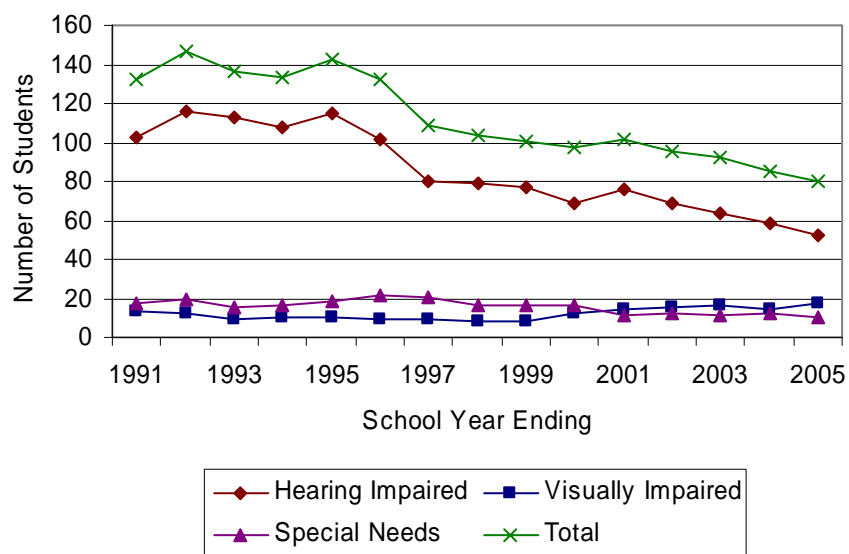
ISDB Enrollment Trends

During the 1990–91 through 2004–05 school years, average annual enrollment at ISDB dropped 40 percent.⁵ As shown in exhibit 3.1, average campus enrollment had decreased to 80 students during the 2004–05 school year.

Much of the decline in student enrollment is due to a drop in the number of hearing-impaired students attending the school. During the 1990–91 through 2004–05 school years, the number of hearing-impaired students at ISDB decreased 48 percent. The number of special needs students or multiple-

⁵ Average annual enrollment was calculated by summing ISDB enrollment count sheets and dividing by the total number of sheets.

**Exhibit 3.1: Idaho School for the Deaf and the Blind
Average Campus Enrollment, by School
Year**



Source: Office of Performance Evaluations' analysis of the Idaho School for the Deaf and the Blind student count data.

handicapped students attending ISDB experienced a similar decline. During the same period, the number of visually-impaired students at ISDB increased. The number of visually-impaired students grew from a low of 8 students in the 1998–99 school year to 17 in the 2004–05 school year.

The drop in total campus enrollment also reflects a significant reduction in the number of students residing on campus. During the 1991–92 school year an average of 98 students lived in ISDB’s cottages. By the 2004–05 school year, the average number of students living in the cottages had dropped to 43 students.

Current Enrollment

ISDB’s campus enrollment is currently at the lowest level for which data are available. As of September 20, 2005, ISDB reported that 75 students were enrolled at the school. This includes 38 day students and 37 students who reside on campus. Exhibit 3.2 shows the home district of each of the residential and day students enrolled at the campus.

National and Statewide Enrollment Trends

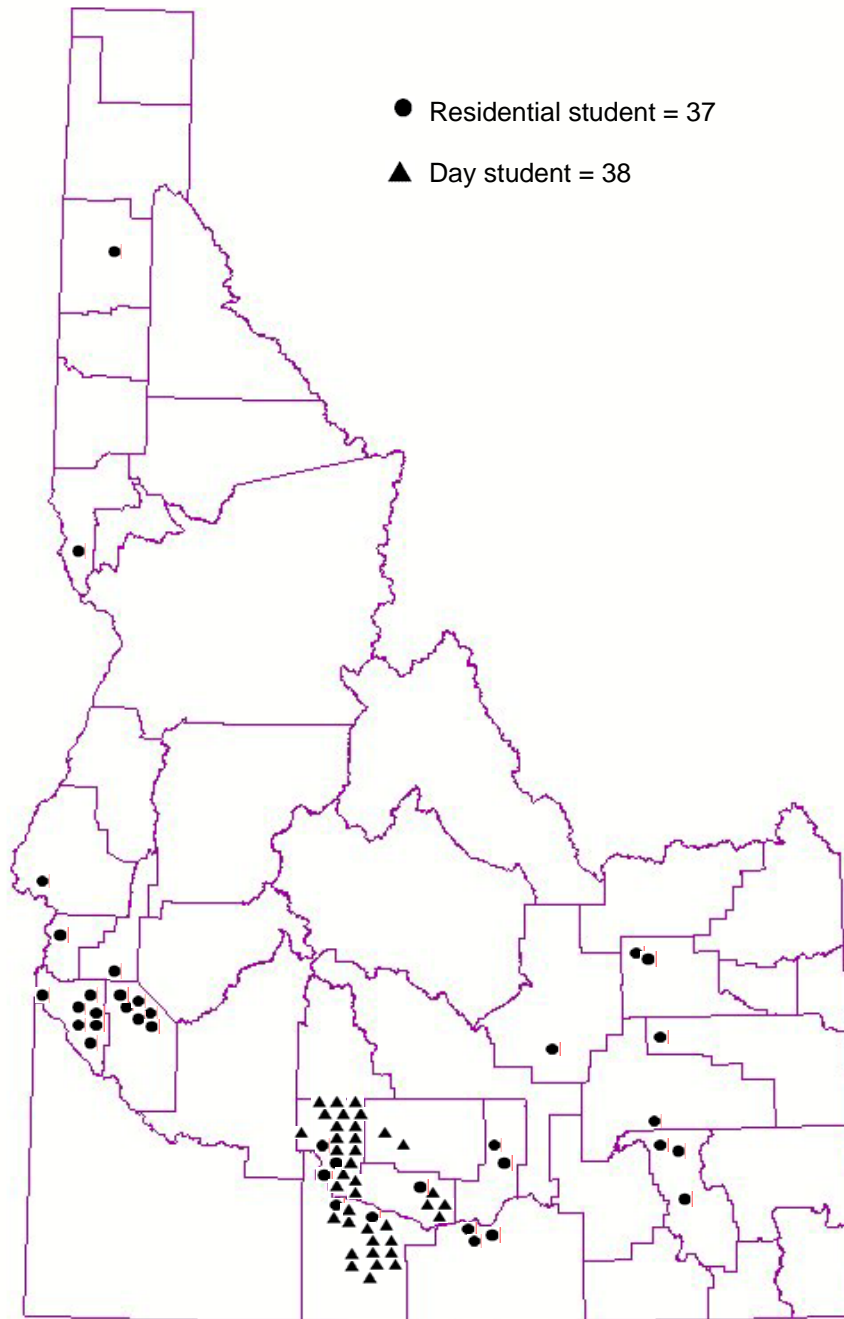
Public residential schools in other states have also experienced enrollment declines during this period. Based on information obtained from the US Department of Education, the number of students ages 6 to 21 served in public residential schools who are hearing and/or visually impaired, dropped 18.3 percent from 1992 to 2001.^{6,7} The number of sensory-impaired students served in public day school programs has remained fairly constant, dropping less than one percent over the ten-year period.⁸ In 2001 (the most recent year for which information is available), 7.7 percent of school-age, sensory-impaired students nationwide were served in public residential schools and 4.6 percent were served in day school programs.

⁶ US Department of Education, Office of Special Education Programs, *25th Annual Report to Congress on the Implementation of the Individuals with Disabilities Education Act* (2005). The information presented here is for students ages 6 to 21 who receive special education services under the Individuals with Disabilities Education Act. These figures do not include sensory-impaired students who receive home schooling or those with a sensory impairment that does not require special education services. The numbers presented also do not include children from birth to age five because data was not collected or reported for this age group throughout the time period.

⁷ Enrollment at public residential schools decreased for each of the three categories of sensory impairments. However, the rate of decline varied by the type of impairment. Enrollment of visually-impaired students at public residential schools decreased 35.1 percent over the ten-year period, while enrollment of hearing-impaired students at these schools dropped 10.3 percent.

⁸ Enrollment trends for public day school programs varied by the type of impairment. The number of hearing-impaired students and students who are deaf and blind, served in day school programs dropped 11.9 percent and 18.3 percent, respectively, over the ten-year period. In contrast, the number of visually-impaired students served in day school programs increased nearly 60 percent during this period.

Exhibit 3.2: Idaho School for the Deaf and the Blind Residential and Day Students, by Location of Home School District, September 20, 2005



Note: Boundaries shown are county boundaries, not school district.

Source: Office of Performance Evaluations' review of the Idaho School for the Deaf and the Blind enrollment data.

While enrollment in public residential schools decreased during the ten-year period from 1992 to 2001, the total number of students with sensory impairments increased 12.6 percent. Nationwide, in 2001, more than 98,000 students with sensory impairments received educational services under the Individuals with Disabilities Education Act.⁹ In Idaho, the number of sensory-impaired students dropped 8.6 percent during the 1999–2000 through 2003–04 school years. With the exception of Nevada, each of Idaho’s neighboring states also experienced a decline in the number of school-age, sensory-impaired students during this period.

Reasons for Decline in Campus Enrollment

Several reasons have been cited for the reduction in enrollment at public residential schools, including federal policies that require placement of disabled students in the least restrictive environment, an increase in services available in local school districts, and virtual elimination of hearing and vision impairments caused by rubella (German measles).

Federal law encourages education of students in the least restrictive environment. As discussed in chapter 2, the federal Individuals with Disabilities Education Act requires students with disabilities to be educated in the least restrictive environment. The act specifies that, to the extent possible, students with disabilities are to be educated with students who are not disabled. Students with disabilities are to be placed in special classes or separate schools “only when the nature or severity of the disability of a child is such that education in regular classes with the use of supplementary aids and services cannot be achieved satisfactorily.”¹⁰

More services are now available in school districts. School districts have expanded services for sensory-impaired students because of these federal requirements. In our survey of local school districts and charter schools in Idaho, nearly three-fourths of respondents reported serving sensory-impaired students. In addition, 63.6 percent of survey respondents reported they had not used ISDB’s residential services and 12.1 percent said their reliance on these services was decreasing. The availability of ISDB’s outreach services appears to have contributed significantly to districts’ ability to serve sensory-impaired students. A majority of the districts serving sensory-impaired students reported they were poorly prepared to provide such services without ISDB’s support. For more information about ISDB’s outreach program, see chapter 4.

⁹ This includes children ages 6 to 21 who were classified as hearing impaired, visually impaired, or deaf and blind. It does not include students classified as multiple handicapped with a hearing or visual impairment.

¹⁰ 20 USC § 1412 (a)(5)(A)

Nationwide trends also indicate that local school districts are serving a larger share of sensory-impaired students. Based on our analysis of US Department of Education data, the number of sensory-impaired students served in local school districts increased 21.4 percent during the ten-year period from 1992–2001 (the most recent year for which data was available). During this same period, the portion of all sensory-impaired students served by local school districts increased from 78.8 to 84.9 percent.

Students whose sensory impairments were caused by rubella have passed through the school system. Rubella, or German measles, has been as a major cause of birth defects in the United States. Prior to approval of a vaccine in 1969, thousands of children with rubella lost their hearing or sight. Outbreaks of rubella in the 1960s produced a bulge in the number of sensory-impaired students in the educational system. The last major outbreak of rubella in the United States occurred in 1964 and these students have now passed through the educational system. Studies in Washington and Kentucky cite the reduction in rubella as one reason for the decline in enrollment in residential programs for students with sensory impairments.

Other possible factors include campus location and concerns about the quality of services. As part of our survey of parents in the outreach program, we asked if placement at ISDB had been considered for their children and, if so, to identify factors that contributed to their decision to keep their children at home. More than half of those responding said the school was too far from home. Others indicated they did not want to place their children in a residential setting, or said a residential setting was not required for their children. Several respondents cited concerns about the quality of services at ISDB as a factor in deciding against placement at the school.

ISDB Needs to Track Enrollment Trends and Project Future Enrollment

ISDB takes periodic counts of campus enrollment, but has not used this information in a systematic way to monitor enrollment trends or project future enrollment. Without this type of information, it is difficult for agency management and policymakers (the State Board of Education and the Legislature) to make informed decisions about the school's future.

During the course of our review, ISDB's interim superintendent reported that he believed enrollment at the school could increase from 80 students in the 2004–05 school year to 100–110 students over the next five years. The interim superintendent believes that planned program improvements at the school will lead to increased enrollment, and told us the number of campus inquiries had increased significantly in the past year.

Based on available state and national data, such an increase appears unlikely. Campus enrollment has declined in nine of the past ten years. In addition, over the past several years, the average age of students at the school has increased, and the number of elementary-age students has decreased. Currently, only 32 percent of ISDB students are in elementary school and more than half of all students are in grades 9 through 12. This is partly due to more students coming to ISDB after first spending time in the public school system, but also suggests the campus population could continue to shrink as large numbers of current students graduate.

Last spring, 11 of the 80 students attending ISDB graduated and, as previously noted, campus enrollment was at 75 students as of September 20, 2005. Over the past ten years, campus enrollment has dropped by an average six students per year. Should this trend continue, ISDB's enrollment could drop to approximately 60 students within three years.

To aid future decision making, ISDB needs to more closely track information regarding enrollment. Enrollment information should be regularly recorded in a database or spreadsheet program. Data collected should include a breakdown of students by disability, age, grade level, and home district, and should also allow an analysis of the length of time students spend at ISDB and the reasons students leave the school. The school should also monitor trends regarding the number of sensory-impaired students statewide using information from the State Department of Education and its regional outreach consultants. Information regarding enrollment trends and projections should be annually reported to the State Board of Education and the Legislature.

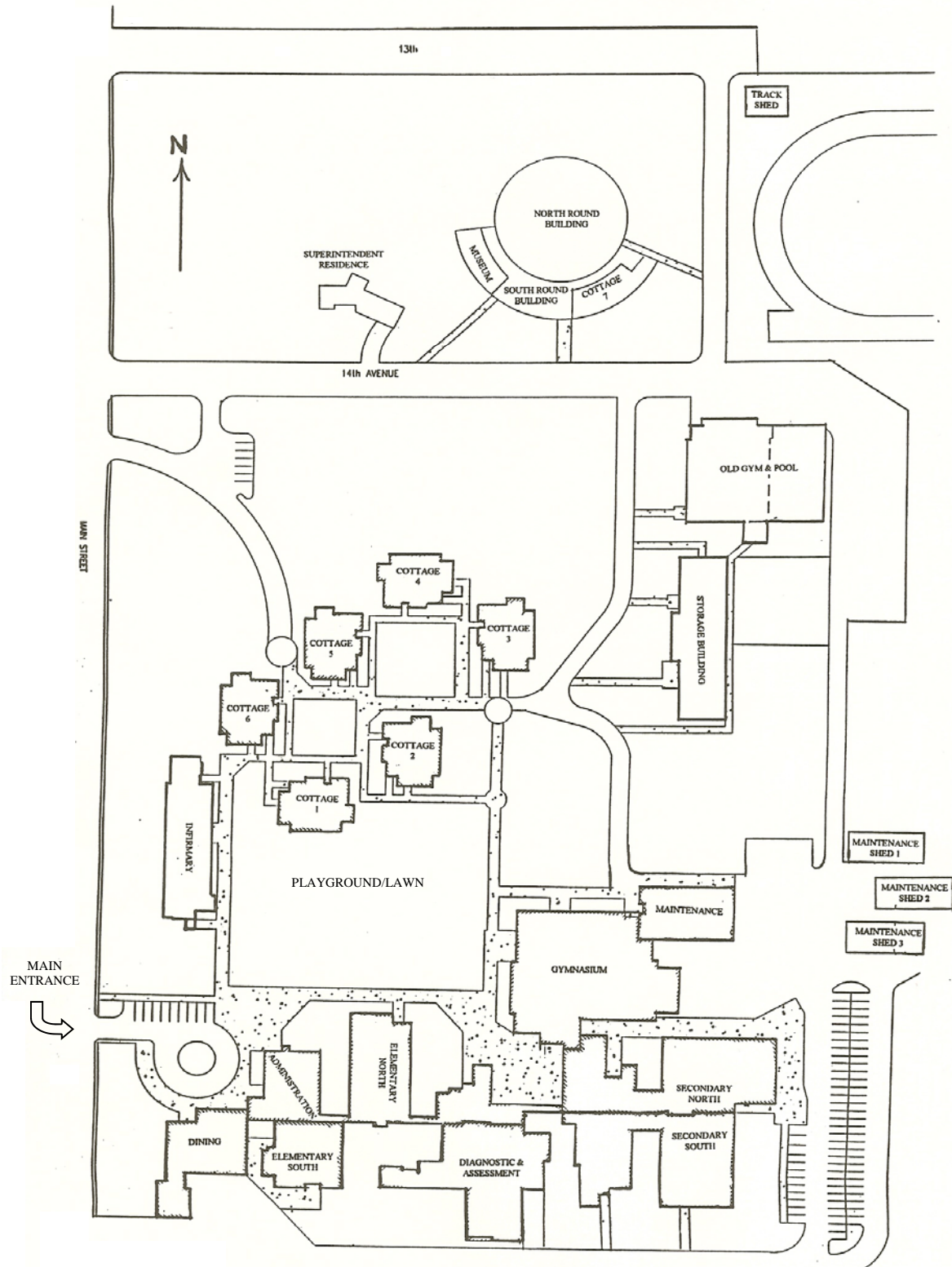
Declining Enrollment Results in Campus Facilities Being Used at Less than One-Half Capacity

Because of the substantial drop in ISDB enrollment, the campus is currently serving far fewer students than its capacity. Exhibit 3.3 provides an overview of the 40 acre campus.

The sprawling main school building is located near the main entrance and includes the dining hall, administrative offices, elementary school, secondary school, diagnostic and assessment space, and two gymnasiums. The building was completed in 1987 and covers approximately 120,000 square feet. It has 32 classrooms and 4 vocational class spaces. ISDB management estimates this facility could accommodate approximately 250 students—more than three times the number of students currently on campus—with appropriate staffing.

The school's residential facilities are not fully used. The campus has six cottages, completed in 1986, with a combined 26,406 square feet of residential space. These cottages can comfortably accommodate 72 students with existing

Exhibit 3.3: Campus Map, Idaho School for the Deaf and the Blind



Source: Idaho School for the Deaf and the Blind



Main building at the Idaho School for the Deaf and the Blind.



A cottage at the Idaho School for the Deaf and the Blind.

furnishings.¹¹ During the 2004–05 school year, residential student enrollment averaged 43 students, or 60 percent of these cottages' current capacity. In addition, because of declining enrollment ISDB converted other space that was previously used to house residential students to other uses during the 2003–04 school year. Factoring in recent enrollment declines and the residential space that was converted to other uses, ISDB residential facilities are currently used at 44 percent of capacity.

The campus includes several other buildings that are no longer fully used by ISDB. For example, a 28,500 square foot dormitory, built in 1941, is now used primarily for storage. In addition, much of a 23,270 square foot building that was constructed in 1968 and previously served as the school's administrative offices, is leased because the space is not needed for campus programs.

Drop in Enrollment Contributes to Rising Costs Per Student

ISDB's costs for serving students at its Gooding campus are significant, and have grown as student enrollment has declined. We reviewed fiscal year 2005 expenditure information from the Statewide Accounting and Reporting System to estimate ISDB's costs for serving residential and day students. We focused our review on ISDB's current operating expenditures, and excluded capital outlay costs.¹² ISDB officials reviewed our analysis and concurred with the accuracy of the information used.

We estimate the school spent approximately \$82,000 per residential student and \$59,000 per day student in fiscal year 2005. As shown in exhibit 3.4, costs to educate students were distributed evenly across all campus students. For the year, ISDB spent \$23,789 per student for instructional services and \$13,917 per student for educational support services. Administrative and maintenance costs were also spread across all students.

Two factors contributed to the higher costs per residential student. Costs to operate the cottages in fiscal year 2005 totaled \$925,927 for 43 students, averaging \$21,533 per student. In the same year, costs to provide food service to residential students averaged \$4,806 compared to \$1,999 for day students. Transportation was one cost that was higher for day students than residential students. ISDB operates six daily bus routes to transport day students to and from their home districts. In fiscal year 2005, costs per student were \$3,396 for day students and \$1,959 for residential students.

¹¹ ISDB's interim superintendent reported that these cottages could accommodate as many as 144 students if bunk beds were used in place of the existing beds.

¹² In fiscal year 2005, ISDB spent \$244,658 to purchase a school bus, computer equipment, and other capital items. Capital outlay costs accounted for three percent of ISDB's total expenditures that year.

Exhibit 3.4: Estimated Costs Per Student for Idaho School for the Deaf and the Blind Campus Students, Fiscal Year 2005

	Residential Students	Day Students
Instruction	\$23,789	\$23,789
Educational support	13,917	13,917
Maintenance	10,588	10,588
Administration	5,372	5,372
Residential services	21,533	0
Food services	4,806	1,999
Pupil transportation	<u>1,959</u>	<u>3,396</u>
Total ^a	\$81,964	\$59,062

^a Totals do not sum due to rounding.

Source: Office of Performance Evaluations' analysis of the Idaho School for the Deaf and the Blind expenditure data from the Statewide Accounting and Reporting System (STARS).

Other States Have Taken Steps in Response to Declining Enrollment and Increased Costs

Other states have also experienced declines in enrollment at their residential schools for sensory-impaired students. We identified three states that closed their schools for the deaf or the blind because of declining enrollment. Some states have kept their schools open but have made significant changes to control costs, and several states have initiated studies to examine the issue.

Federal law requires states to provide a continuum of services to disabled students. However, federal statutes and regulations do not specifically require states to operate a residential school.¹³ The following case studies provide more information about states that have closed schools in response to declining enrollment.

Nebraska closed its residential school for the deaf in 1998 because of declining enrollment and rising costs per student. At the time, there were 24 residential

¹³ 34 CFR § 551

students at the school. Following the closure, Nebraska established regional day services to fill service gaps. The state also helps local school districts pay the costs of sending some students to the nearby Iowa School for the Deaf, which is located only seven miles from the site of Nebraska's closed facility.

Michigan closed its residential program for the blind in 1999 because of declining enrollment. Enrollment at the school had dropped below 20 students. The Michigan School for the Blind now provides outreach and other services to help students succeed in their home school districts.

Wyoming closed its school for the deaf in 1998 because of diminishing enrollment. At the time the school closed, only about 10 students remained at the facility. Most of Wyoming's deaf and hard of hearing students now attend public school, although a few attend schools for the deaf in other states. The Wyoming Department of Education now operates two regional offices that offer outreach services and support to students and teachers throughout the state.

Several other states do not have state-operated schools for hearing-impaired or visually-impaired students. Based on our research, 13 states do not have state-operated schools for the blind and nine states do not have state operated schools for the deaf. Most of these states are in the eastern United States, but several, including Wyoming and Nevada, are in the west. These states appear to rely primarily on school districts to provide services to students with some support from regional outreach efforts. Students in a number of these states may also be served by private schools.

A number of states have taken steps to address declining enrollment and control costs for services to sensory-impaired students. The following case studies illustrate these efforts.

Maine operates a state school for the deaf in Portland, its largest city. Due to declining enrollment, the school found it difficult to offer the broad curriculum needed for a full secondary school program, and decided to eliminate the program. The school entered into a cooperative arrangement with a nearby high school to serve secondary-age students and agreed to provide three new high school teachers, including one who could teach sign language classes, and a staff of sign language interpreters. This arrangement has enabled the students to receive a full high school program without losing the social and academic support of the deaf community. The state has realized a cost savings from eliminating the program.

Oregon's school for the blind eliminated its weekend stay program in 2002 due to budget cuts. Since that time, all students return home on weekends and holidays, and transportation costs are the responsibility of the student's home school district. The school's superintendent reports, however, this change has led to a decline in enrollment at the school.

South Dakota is considering eliminating the residential program at its school for the deaf due to low enrollment. A representative of the state board of regents that oversees the school said changes in deaf education and more frequent use of cochlear implants have led to fewer students residing on campus. Enrollment projections indicate the number of students residing in the dorms will continue to drop. South Dakota officials are considering using foster families for the few students who would continue to need residential services.

While most states continue to operate state schools for the deaf and/or blind, some states are beginning to study the impact of declining enrollment on program costs and investigate alternatives. According to the assistant superintendent of the Arizona School for the Deaf and Blind, who worked in Nebraska when its school was closed, six to seven states have contacted him as they examine these issues. In addition, representatives of approximately 35 states attended a recent conference regarding regionalization of services.

Due to declining enrollment at the Gooding campus, facilities are not fully used and the annual costs to operate the school range from about \$59,000 to \$82,000 per student. Costs per student could continue to rise if future enrollment continues to decline. Policymakers face difficult decisions about the future of the Gooding campus because of these trends. Chapter 6 of this report provides options for policymakers to consider when responding to these changes and determining how ISDB can best serve the needs of sensory-impaired children as it enters its second century of operation.

Recommendations

3.1: To assist policymakers in making future decisions about the operation of the Gooding campus, ISDB should develop the following processes:

- Establish an ongoing process for tracking campus enrollment
- Use enrollment trend data and other available information to regularly project future enrollment
- Report enrollment trends and projections to the State Board of Education and the Legislature on an annual basis

The costs of implementing this recommendation should be minimal or none because this is a typical ISDB management function. Implementation should be complete by July 1, 2006.

3.2: To improve economic efficiency, ISDB should work with the State Board of Education to develop a plan that identifies opportunities to address rising costs per student and share the results of these efforts with the Legislature. For example, a plan should address appropriate staffing levels for administration, instruction, maintenance, support, student-teacher

ratios, number of cottages in operation, and use of the facilities for other purposes.

The costs of implementing this recommendation should be minimal because this process is already underway by the State Board of Education. Results of this recommendation should be shared with the Legislature during the 2006 legislative session and later as more analyses are completed.

Chapter 4

Outreach Services and Costs

The Idaho School for the Deaf and the Blind (ISDB) provides outreach services through seven regional offices at no cost to local school districts. ISDB reported serving an average of 660 students in school districts statewide during the 2004–05 school year, and spent an average of \$3,000 per student that year. These costs are in addition to annual district costs, which can be substantial and vary from several thousand to more than \$30,000 per student.

School district officials and parents generally expressed high levels of satisfaction with ISDB outreach services. They told us the demand for outreach services is increasing, and many districts felt poorly equipped to serve sensory-impaired students without ISDB's support.

This chapter also examines several other issues including salaries for ISDB certified staff, which lag behind what the state provides for school district teacher salaries, the need to improve caseload and workload management, the need to formalize partnerships with school districts to avoid legal and/or financial disputes, and the lack of qualified educational interpreters in Idaho.

This chapter addresses the following questions:

- What outreach programs does ISDB provide?
- How many students are served through these programs?
- What is the annual cost of outreach services?

Demand for Regional Outreach Services Is Increasing

ISDB offers a range of services through its regional outreach program. Many school districts report that they rely on the outreach program to help them serve students with hearing or visual impairments, and indicated the demand for outreach services is growing. District officials and others we spoke with also highlighted the need to increase the availability of qualified educational interpreters.

ISDB provides assistive services to children who are sensory impaired and works cooperatively with school districts and the Department of Health and

Welfare's Infant and Toddler program. Services are provided through its seven regional offices. ISDB employs 25 full-time equivalent consultants statewide. The number of consultants in each regional office varies from two to five (see exhibit 4.1). Two program directors from ISDB's headquarters in Gooding provide management and oversight of these regional outreach consultants. ISDB also employs three instructors who teach auditory-oral and total communication classes in the Meridian School District.

The following is a list of some of the services ISDB provides at no cost to school districts and parents:

- Home based early intervention for children from ages birth to three years of age
- Regional preschool classes
- Evaluation and diagnostic services
- In-service training and presentations for school district personnel
- Participation in developing students' individualized education programs
- Loaned out equipment such as hearing aids and visual technology equipment
- Braille and large print production and Braille instruction (also offered to campus students)
- Summer and winter enrichment programs (also offered to campus students)

ISDB told us they began offering outreach services in the mid-1970s in response to requests from parents who did not want to send their young children to the residential campus in Gooding. Shortly after, the outreach program expanded statewide. Outreach staff served, on average, 660 students during the 2004–05 school year.¹

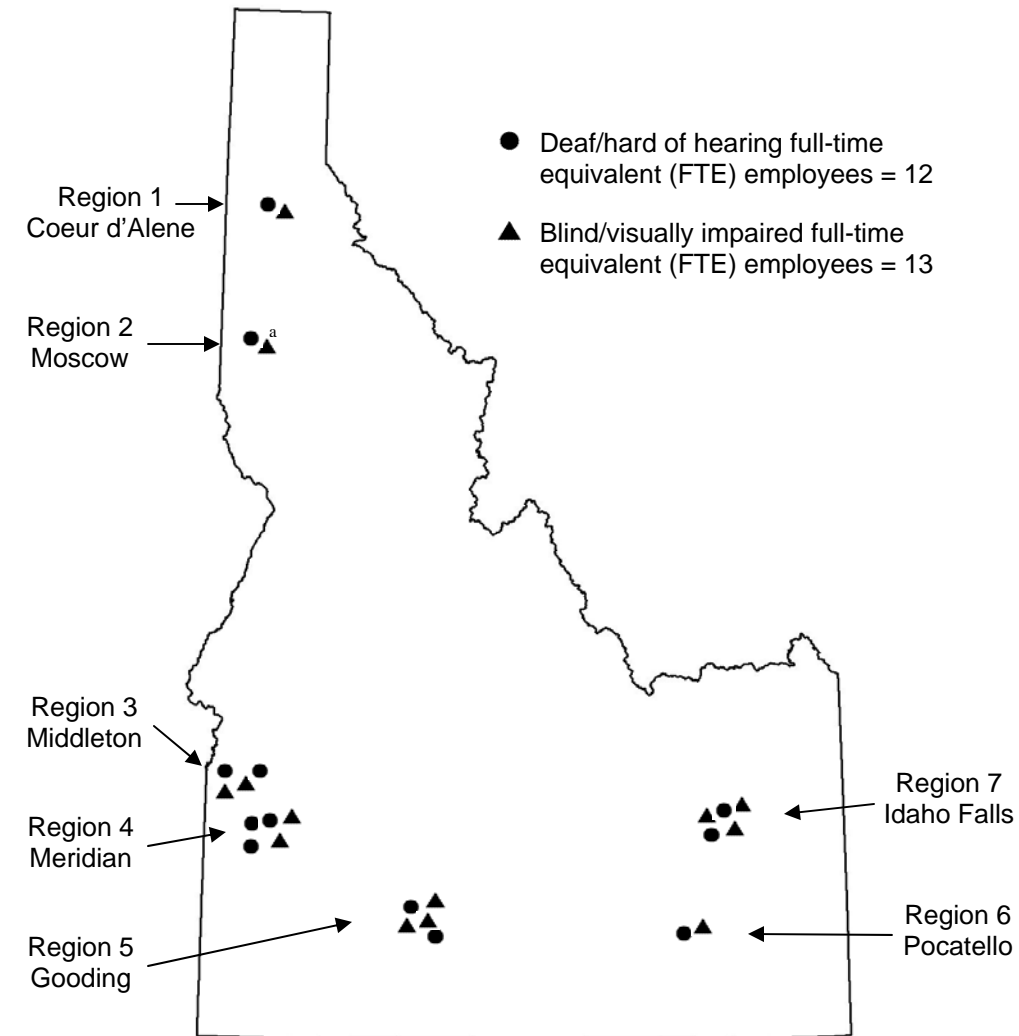
School District Reliance on Outreach Services

School districts reported that their reliance on ISDB services is changing. For instance, respondents indicated a steady or *increasing* reliance on ISDB outreach services and a steady or *decreasing* reliance on residential services.

The number of students served through the ISDB outreach program grew 25 percent over the past 11 years. As shown in exhibit 4.2, caseload increased from 530 cases during the 1994–95 school year to 660 cases in 2004–05. This exhibit also shows a steady increase in hearing-impaired children served compared to a recent decrease in visually-impaired children. ISDB told us this recent decline is the result of more visually-impaired students being served by district teachers.

¹ Average of monthly caseload counts compiled by ISDB during the 2004–05 school year.

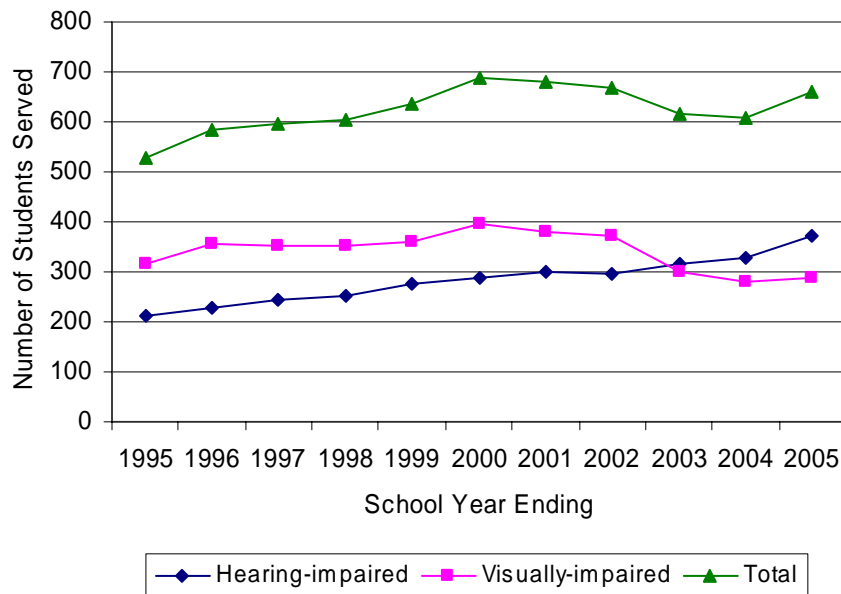
Exhibit 4.1: Idaho School for the Deaf and the Blind Regional Outreach Offices and Number of Employees, School Year 2005–06



^a As of September 20, 2005, this position was vacant and ISDB was attempting to fill it.

Source: Office of Performance Evaluations' analysis of the Idaho School for the Deaf and the Blind information.

**Exhibit 4.2: Idaho School for the Deaf and the Blind
Average Yearly Outreach Enrollment, by
School Year**



Source: Office of Performance Evaluations' analysis of the Idaho School for the Deaf and the Blind caseload data.

School Districts' Capacity to Provide Services

During the 2004–05 school year, nearly three-fourths of Idaho's school districts and charter schools reported providing services to students who were sensory impaired. However, about one-half of districts reported they were poorly prepared to provide services without ISDB assistance. Only about one-third of respondents reported being adequately prepared and less than ten percent believed they were well prepared to provide services to sensory-impaired students. It is noteworthy to mention that districts believed they were somewhat better able to provide adequate services to students who are hearing impaired than those who are visually impaired.

Districts that indicated they *could* provide adequate services reported having experienced staff, necessary equipment, or said they could obtain services from another district or contractor. Districts that said they *could not* provide adequate services reported having limited or no resources for deaf or hard of hearing students or lacked trained or experienced staff to work with blind or visually-impaired students.

When asked what changes district officials would like to see, the following responses were the most common:

- More regionally based services and support (rather than residential)
- More access to assistive technology equipment and materials
- More audiological and psychology services

Several districts said they would like ISDB to provide more *direct* services to children in school districts in addition to the *consulting* services typically provided by outreach staff.

Need for Skilled Educational Interpreters

During the course of this evaluation several stakeholders expressed concern with the lack of skills of Idaho's approximately 85 educational interpreters. Educational interpreters are specialized interpreters who work in a classroom setting and are required to have an understanding of the subject matter. Highly skilled educational interpreters are able to convey more classroom information to students than those with lesser skills.

According to the director of Idaho's Council for the Deaf and Hard of Hearing and a position paper prepared by the Educational Interpreter Interagency Consortium, Idaho does not require educational interpreters to meet any minimum proficiency standards or obtain certification or licensure. The council reports 22 states require educational interpreters to attain a minimum score on the Educational Interpreter Performance Assessment, a nationally recognized skills assessment test. This test measures the percentage of classroom information conveyed to the student. For example, an assessment score of 4.0 to 5.0 indicates the interpreter is able to convey approximately 80 percent of classroom information to the student.

The consortium reported that with financial assistance from a State Department of Education grant, 67 of Idaho's approximately 85 educational interpreters voluntarily took this assessment in 2003. Test results indicated 4 of 5 educational interpreters could convey only 60 percent *or less* of classroom information to students. This is of concern, because most states using the assessment require their educational interpreters to convey 60 percent *or more* of classroom information to students.

Concerns about the quality and availability of educational interpreters were reported to us by parents, school district officials, and ISDB staff. For example, although some districts report they are able to find well qualified interpreters, many other districts report difficulty in this area. Some districts responded to this issue with these specific comments:

We hire only qualified interpreters, but there are times when it is difficult to locate and hire such staff. Of course, the cost is always a concern.

The greatest area of difficulty is finding a sign language interpreter.

If we had to hire an interpreter, we have no one in the district who would be able to effectively evaluate the adequacy of the services and would need to contract with a teacher of the deaf or have ISDB provide supervision of that staff.

I know of no interpreters in the area. Our teachers are not trained in providing instruction to deaf or hard of hearing students.

The consortium is proposing to address this concern through legislation that would require Idaho educational interpreters to pass the Educational Interpreter Performance Assessment with a minimum score, or hold a nationally recognized certification.

The consortium proposes a three to five year grace period for current interpreters to meet the minimum standard. However, funding for training and credentialing interpreters would be required and the amount and source of those funds have not yet been determined.

Outreach Services in Other States

Washington Offers Innovative Approach for Educating Blind Students

About two years ago, the Washington State School for the Blind initiated an online distance learning program that uses speech software to read lessons to the blind students enrolled in the program. According to their superintendent, the school has seen a "large increase in use of outreach services, largely due to the pilot distance learning project."

The course offerings of the distance learning program can supplement courses offered by schools, including schools that serve sensory-impaired students.

Provision of outreach services for students who are sensory impaired is a common model of service delivery in other states. We found variations in how outreach services are provided, though there is a common concern regarding the availability of quality educational sign language interpreters.

Nebraska closed its residential school for deaf students in 1998 and relies largely on an outreach model to provide services to hearing-impaired students.² Following closure of the school, outreach services were expanded and legislation was passed requiring development and application of educational interpreter licensing guidelines to ensure quality interpreters are available to districts.

Washington is initiating a cost-sharing program where districts can purchase up to 80 percent of an outreach consultant's time. However, this is a new program and results are not yet available. Washington also reported school district concerns of skill level, recruitment, and retention of school-based sign language interpreters.³

² Approximately 12 to 15 deaf students are served by a residential school for the deaf in Iowa.

³ Washington School for the Deaf, "Models of Education and Service Delivery," Washington State Institute for Public Policy (2002).

Wyoming has relied solely on an outreach model since 1998 for the education of its deaf students. When their campus program was closed, the legislature increased funding for the outreach program, which currently employs 12 consultants who work with district teachers and district-hired service providers.

Costs to Serve Students at the District Level Can Vary and Be Substantial

As part of the evaluation, we gathered information about ISDB and school districts' costs to provide services to sensory-impaired students. Both ISDB and districts devote significant resources to serving students who are hearing or visually impaired.

ISDB Outreach Costs

Outreach costs accounted for approximately one-fourth of total ISDB expenditures in fiscal year 2005. In that year, we estimated ISDB spent about \$1.99 million for outreach services. These costs are spread over many more students than served on campus. For example, ISDB caseload data indicates the agency served on average 660 children and students during the 2004–05 school year. We estimate ISDB spent an average of \$3,016 per student for outreach services that year. The bulk of these costs, about \$1.61 million, were for operating expenses associated with regional outreach consultants and teachers. Other expenses, about \$380,000, included media services such as the captioned media program and large print books, training and testing of educational interpreters, as well as a share of the cost for agency administrative and information technology support.

School District Costs

School district costs to serve sensory-impaired students can be substantial. We interviewed officials from several school districts to gather information about the costs they incur specifically to serve these students.⁴ The size and location of the districts we looked at varied as did the number of sensory-impaired students served.

We found the cost incurred to serve sensory-impaired students varies depending on the type and severity of the disability. For example, some hearing-impaired students can function effectively in mainstream classrooms with an amplification system costing several thousand dollars, while more profoundly deaf students may require the services of a full-time sign language interpreter at a cost of more than \$30,000 per year.

⁴ Due to time constraints, we were not able to determine the full cost for districts to serve sensory-impaired students. This would have required a thorough analysis of district educational and support services, as well as a detailed review of accounting records for a representative sample of districts.

District costs also vary depending on the number of students served. In general, the number of sensory-impaired students in a district is small. Based on information obtained from the State Department of Education, Meridian served the largest number of sensory-impaired students in fiscal year 2005. That year, 53 of the district's nearly 29,000 students were reported to be sensory impaired. More than 40 districts did not report serving any sensory-impaired students during the 2004–05 school year and 53 other districts reported they served five or fewer students with sensory impairments.

The following case studies illustrate the variation in the services provided and costs incurred by school districts to serve sensory-impaired students.

Blaine County School District reported serving six sensory-impaired students in the 2004–05 school year. Students are served in mainstream classrooms and the district provides needed equipment, such as a voice amplification system for hearing-impaired students and specialized computer hardware and software for a visually-impaired student at an estimated cost of \$1,000 to \$2,000 per student. The district employs paraprofessionals to work with students at an annual cost of approximately \$40,000 per position, including benefits. The district reports having difficulty recruiting trained interpreters and has obtained training for its paraprofessionals to meet its needs. Orientation and mobility training services for visually-impaired students have been obtained on a contract basis for an estimated \$6,400 per year for two students.

Horseshoe Bend School District reported serving one deaf child in the 2004–05 school year. The student is served in a mainstream classroom and the district provides a full-time interpreter for the child at a cost of \$30,000 with benefits. The district also purchased a voice amplification or FM system for use by the child at a cost of \$2,700.

Meridian School District reported serving 53 sensory-impaired students from within the district during the 2004–05 school year. The district employs teachers who are specifically certified to work with visually- and hearing-impaired children. The district also has classrooms specifically for elementary students with hearing impairments. Meridian employs 17 sign language interpreters and 6 aides who work specifically with sensory-impaired students, and contracts for audiological and orientation and mobility services. The district has analyzed its costs to serve hearing-impaired students and estimates that it costs an average of \$18,000 to serve elementary deaf students and \$22,000–\$25,000 to serve deaf students who are in middle school or high school. The district also served some sensory-impaired students from other nearby districts because they can provide a higher level of services at a lower cost than the contracting district.

Moscow School District reported serving eight sensory-impaired students during the 2004–05 school year. Students are served in mainstream classrooms with support from a certified teacher of the deaf. The district also employs five

full-time interpreters and one aide who works with visually-impaired students at an estimated annual cost of \$170,000, including benefits. Audiology and orientation services are obtained on a contract basis for an estimated cost of \$3,500 per year. The district has also served sensory-impaired students from several districts in the surrounding area. According to district officials, one nearby district paid \$65,000 for Moscow to serve two hearing-impaired students.

ISDB Instructor Salaries Are Less than School District Teachers

During its 2005 budget hearing, ISDB's interim superintendent told the Joint Finance-Appropriations Committee that the average ISDB teacher salary was 23 percent less than the average salary of school district teachers of equal education and experience. We examined this issue of salary equity by reviewing ISDB salary information and the state's teacher funding schedules.

ISDB employs a core group of highly trained educational staff to serve students in its campus and outreach programs. More than three-quarters of campus and outreach instructors have master's degrees. We reviewed an ISDB analysis of 2004–05 school year salaries and concluded that 39 of 47 ISDB campus instructors and outreach consultants were paid less than school districts generally pay classroom teachers of the same education and years experience.⁵ Overall, ISDB instructor salaries would need to be increased by about **13 percent** to be comparable to funding the state provides to school districts for teacher salaries. Districts can use local dollars to supplement state funding for teacher salaries, possibly widening the percent difference.

ISDB has requested additional funding to improve salaries of instructional staff and outreach consultants in nine of the last ten years. During this period, the Legislature appropriated funding three times to address salary equity, although each time the amount appropriated was less than ISDB requested. In its fiscal year 2006 budget request, ISDB asked for \$277,000 to increase salaries for instructors, interpreters, support staff, and some administrators but did not receive funding for this purpose. As described in chapter 1, salary equity is an issue currently under review by the State Board of Education.

⁵ School districts are apportioned state funding for salaries based on several factors including an index of educational credits and years of teaching experience. The index is found in IDAHO CODE § 33-1004A.

School District and Parent Satisfaction with Outreach Services Is High

Generally, school districts and parents reported high levels of satisfaction with ISDB outreach services. While parents often gave higher marks to ISDB than to their local school districts, some expressed dissatisfaction with the availability and quality of services through the outreach program.

School District Satisfaction

School districts and charter schools responding to our survey reported high levels of satisfaction with ISDB outreach services. Of the school districts and charter schools that reported using ISDB outreach services during the 2004–05 school year, over 95 percent said they were either very satisfied or somewhat satisfied with the services provided.

Satisfaction ratings were particularly high for outreach consultants who worked with blind and visually-impaired students, district in-service presentations, production of Braille and large print materials, and the captioned media program. Satisfaction ratings, while still high, were somewhat lower for audiological and psychological evaluation and diagnostic services and the summer enrichment program. School district officials provided the following comments about ISDB outreach services:

Any time we have needed the services, we have had access to them. The outreach program has been very helpful.

I have worked in Idaho for many years and each time that I've dealt with ISDB I have seen families and kids benefit.

Outreach services make it possible for us to serve students more appropriately and meet family expectations for a least restrictive environment.

The most frequently used ISDB services were technical assistance in general and ISDB staff participation in individualized education program meetings. The least frequently used services were academic evaluation (ten districts), the summer enrichment program (nine districts), and psychological diagnostics (six districts).

Until last year, ISDB's audiologist provided more services to the regions, such as hearing tests, but due to a lack of time, school districts needing these services will either have to seek them locally or travel to ISDB. School districts indicated high satisfaction with ISDB audiological services and some ISDB outreach consultants expressed to us their disappointment in the loss of this service to districts. The ISDB audiologist operates a hearing aid bank from which students can borrow assistive devices.

An official with one small school district expressed frustration at having to pay \$13,000 per year to send a student to a nearby district to receive services when other districts in the Gooding area can obtain day services at ISDB at no cost. This dissatisfaction can be categorized as a desire for more regional ISDB services.

Parent Satisfaction

Parents also reported high levels of satisfaction with ISDB outreach staff and the quality of services provided. Nearly 90 percent of all respondents felt ISDB outreach staff had the skills and expertise to work effectively with children and students. Parent satisfaction included parent/family education, home visits, resources and equipment, and early childhood intervention services. Parents provided the following comments about ISDB outreach services:

The staff that worked with my child are courteous, professional and want what's best for their clients/patients. They are also friendly and take great pride in what they do.

ISDB staff have a vast knowledge of our child's disability and services available. They are also great at educating the whole family, testing and evaluating, teaching, learning new techniques, and advocating for our child.

The outreach program has been a wonderful program. Communication with my son from the time he was born has been invaluable. Use of ISDB library, access to the outreach staff, and supplemental material has improved my parental life and my child's life.

I am impressed with their willingness to help in any way they can without bias on your choice of communication.

In general, parents said they would like to see more services and contact with staff and more sharing of information. Parents also expressed a desire for more oral communication services, more regionally based services, and more sign language classes.

Although high levels of satisfaction with ISDB were expressed by parents, we did receive some reports of dissatisfaction with the quantity and quality of specific services. For instance, the two most common aspects of outreach services parents found dissatisfactory were a general lack of needed services and problems with staff. A less frequently reported concern was a lack of ISDB staff support for the family's chosen method of communication for their hearing-impaired child. Below are examples of parent responses:

The only dissatisfaction has been in the past when there was a shortage of outreach staff.

ISDB is unable to hire a new outreach instructor for our area. The problem I believe is the lack of competitive salary. Idaho is one of the

lowest paid states for teachers of the visually impaired. Please let the legislative body know about the problem.

ISDB does not have the knowledge to help my child. Their [ISDB] recommendations are standard and not specific and I have nobody to help me get the help my child needs.

The consultant backed off and had little to no contact with us when we decided to move to a verbal only method of communication with our child. Once we were no longer using sign language, the consultant rarely made contact with us.

Parents whose children participate in the preschool through first grade special program in the Meridian School District reported dissatisfaction in the following areas:⁶

- Frequency of outreach consultant contact with parent and child (7 of 13 parents)
- Expertise and skills of outreach consultants (4 of 10 parents)
- Appropriate recommendations made by outreach consultant (4 of 12 parents)
- Lack of funding or resources for the program (4 of 10 parents)
- Communication with ISDB (3 of 10 parents)

More information regarding parent input from the preschool, kindergarten, and first grade parents is presented in chapter 5.

Parents were more likely to express dissatisfaction with school district services than services provided by ISDB. When asked how they attempted to address or resolve their dissatisfaction, two-thirds reported using informal methods and the remainder reported using formal methods such as contesting their children's individual education program, mediation with school officials, or requesting due process hearings.

Some parents told us they opted for informal approaches to resolve issues because of the of time and cost required to use formal channels and their fear of retaliation from the school district for challenging its decisions. Few indicated their issues had been resolved satisfactorily.

⁶ This is a relatively small program with 18 students participating during the 2004–05 school year.

ISDB Can Do More to Explain Communication Options for the Deaf and Hard of Hearing

At the start of this evaluation, some parents voiced concerns that ISDB staff are not sufficiently trained in communication options available to families with children who are deaf and hard of hearing. These methods include two types of auditory-oral communication, sign language, cued speech, and total communication, which uses a combination of many methods including sign language and auditory-oral communication.⁷

To determine how widespread these concerns were, we asked parents to comment on information they received from staff on communication options. Nearly all (31 of 32) parents responding to this question said ISDB staff presented sufficient information on communication options. In addition, most parents said information was presented in an unbiased manner. Six parents reported ISDB staff were unsupportive of auditory-oral communication.

We interviewed ISDB outreach consultants and found that ISDB has a checklist of communication options they are to explain to parents. However, some consultants admitted they lacked training and confidence in some of the listed methods. For example, five outreach consultants said they did not know anything about cued speech. Others knew the auditory-oral method very well, but were less comfortable with sign language, and one outreach consultant said she was only confident in explaining and using the total communication philosophy. Additionally, while some outreach consultants felt they had good materials to present to parents and the materials were similar among all outreach consultants, another consultant reported there was no set format or consistent set of materials to present.

Having outreach consultants who are not confident or familiar with all communication methods and do not have sufficient information to present to parents may hinder parent decisions of which communication method is most appropriate. Therefore, we recommend ISDB take steps to ensure all staff understand the various communication methods for deaf and hard of hearing students, and are able to effectively communicate this information to parents.

⁷ According to the National Cued Speech Association, this method is a visual communication system using eight hand shapes placed in four different ways near the face.

Partnership with Idaho's Largest School District Is Not Formalized in Writing

ISDB's partnership with the Meridian School District to provide preschool services for deaf and hard of hearing children has been in operation for many years, but the arrangement has never been formalized in writing.⁸ ISDB pays the salaries of three instructors who teach students from Meridian and surrounding school districts. Meridian provides the classroom space. This approach is popular among parents and has been used by ISDB in the Pocatello and Idaho Falls areas. However, each entity's commitments to this arrangement are not formalized in writing, leaving both parties vulnerable should legal and/or financial disputes arise.

We recommend the arrangement between ISDB and the Meridian School District be formalized in an interagency agreement pursuant to Idaho Code § 67-2332, which requires such contracts to specify purposes, powers, rights, objectives, and responsibilities.

ISDB Does Not Calculate Workload from Caseload Information

The ISDB interim superintendent told the Joint Finance-Appropriations Committee in 2005 that the average caseload of 28 cases per outreach consultant was too high, and the ideal number would be no more than 10 cases per consultant. However, we were told the 10 case target was based on "professional judgment," not on actual workload or an industry standard. To attain a level of 10 cases per consultant, the interim superintendent reported needing 46 additional full-time outreach employees, a 200 percent staffing increase.

Coding of Cases

When ISDB outreach consultants provide services to a new student, a file or "case" is started. ISDB staff apply one of four different codes to these cases to indicate different levels of required work. The following case codes are generally listed in order of decreasing workload:

Active. ISDB regional consultants provide direct interaction on a regular basis to a student and his or her family and/or school.

⁸ The auditory-oral pre-school program is operating in its third year and the kindergarten, first grade auditory-oral program is operating in its second year. ISDB reports the total communication pre-school program has been in place for 31 years in the Boise-Meridian area.

Consultive. ISDB regional consultants are the primary resource for blind/visually-impaired and deaf/hard of hearing issues providing consultation to a school or other service agency/provider.

Referral. ISDB regional consultants are contacted by outside entities to determine eligibility for ISDB services and gathers documentation to determine eligibility and service category.

Monitor. ISDB regional consultants maintain annual/as needed contact to review service plans with the school or other service agency serving Idaho students.

**Distribution of Cases by
Case Code Type,
2004–05 School Year**

Active cases	102
Consultive cases	351
Referral cases	100
Monitor cases	<u>107</u>
Total	660

Although ISDB outreach consultants use these different codes, the interim superintendent combined all cases when reporting to policymakers. This approach does not consider actual workload variations among cases. However, program managers told us they do use this information to monitor workload and allocate resources. For example, additional help has been provided to the regional office in Middleton to address a high caseload of hearing-impaired students.

Weighted Approach to Caseload Management

Reporting all cases equally does not provide an accurate picture of program workload and staffing requirements. To better assess and report actual outreach workload, we recommend using weighted coding. This approach assigns a higher numerical value to cases requiring more work than those requiring less work and would allow ISDB officials to quantify each consultant's workload, identify work patterns regionally or by impairment type, and adjust resources where necessary to maintain an appropriate level of services to students. One outreach program manager reported that numerical values could be added to cases, but had concerns about how well these values would represent workload variations.

We found several caseload management tools that consider the factors facing outreach consultants and could help ISDB develop a more refined coding system. For instance, the Texas School for the Blind and Visually Impaired provides guidance on how to weight cases for more detailed analyses of workload with the following factors:

- Number of students requiring direct services
- Number of students requiring consultation only
- Average daily amount of time outreach consultant travels

- Number of schools served by the outreach consultant
- Students' age and grade
- Students' extent of disability

An official from Wyoming said a task force is currently looking at using weighted caseload management as a way to determine appropriate outreach staffing for sensory-impaired students. She said the task force was the result of the legislature's need for more accountability of how dollars are spent in outreach services.

Recommendations

- 4.1: To improve ISDB staff's ability to educate parents on communication options for their children, ISDB should take steps to ensure its staff understand the various options and can effectively communicate this information to parents.
- 4.2: To avoid potential legal and financial disputes, ISDB should formalize its arrangement of providing instructors to teach classes within the Meridian School District in an interagency agreement pursuant to Idaho Code § 67-2332.
- 4.3: To better understand resource demands, ISDB should separately measure *caseload* and *workload* and report this information to legislative committees.

The costs of implementing recommendations 4.1–4.3 should be minimal or none because these are typical ISDB management functions. Implementation of recommendations 4.1 and 4.2 should be complete by July 1, 2006. ISDB reports that implementation of recommendation 4.3 is underway and information should be available by the 2006 legislative session.

Chapter 5

Cochlear Implants

Cochlear implants are a type of assistive technology that can enable profoundly deaf individuals to detect and process sound. Some consider cochlear implants a major breakthrough in deaf education because of the potential it offers to facilitate communication among deaf and hearing individuals. However, to realize the benefits of this technology, those receiving implants generally require extensive training. Parents, teachers, health care providers, and lawmakers have raised concerns about the availability of adequate services supporting this option in Idaho.

In Idaho, the number of children and students with cochlear implants is small but growing. ISDB has taken some steps to provide services to these individuals, but many parents feel that more needs to be done. The State Board of Education should provide direction to ISDB on the future of these services.

In this chapter we addressed the following questions:

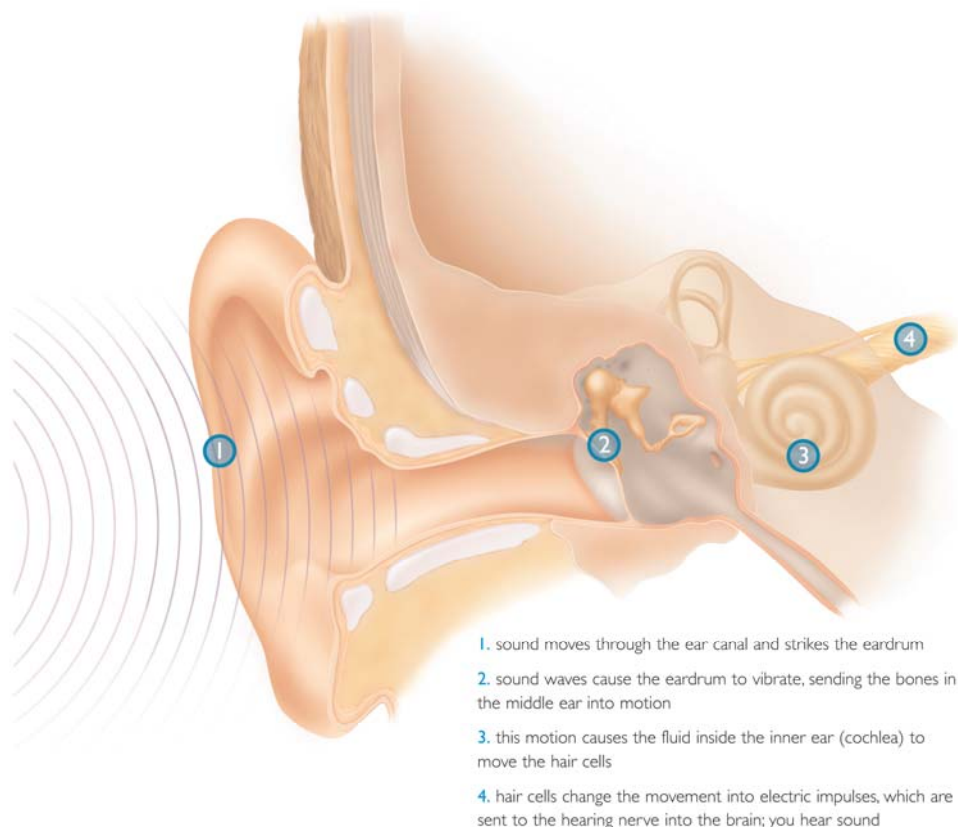
- How is ISDB addressing technologies such as cochlear implants?
- What are the costs and benefits of these technologies?

Cochlear Implant Technology Offers an Alternative Communication Choice

Cochlear implants are devices developed to help the profoundly deaf detect sound. Cochlear implants include both internal and external components. An electronic device is surgically implanted into the inner ear, or cochlea. The electrodes on this device stimulate the auditory nerve fibers in the inner ear and the brain interprets this electric signal as sound.

The external components include a transmitter coil, speech processor, and microphone. The individual wears the transmitter coil and microphone behind the ear and the speech processor can be attached to the body or placed in a pocket. It is important to note that although the implantation procedure allows detection of sound, much habilitative work is required to teach the brain to understand what it means.

Exhibits 5.1 and 5.2 are illustrations of how sound is detected in the natural ear and how sound is detected with a cochlear implant.

Exhibit 5.1: Natural Hearing

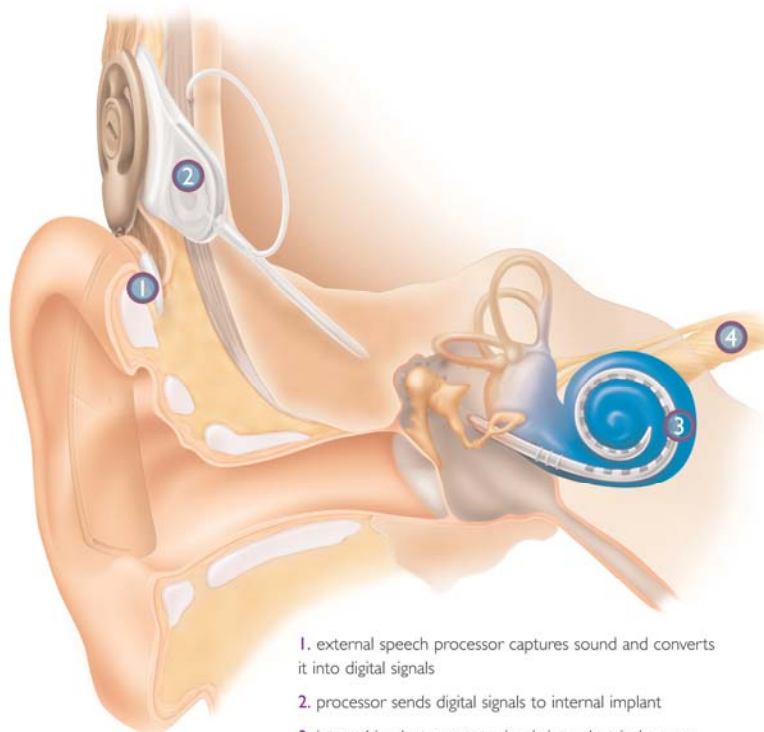
Source: Cochlear Corporation

The US Food and Drug Administration has approved some cochlear implants for children as young as 12 months.¹ It is estimated that since first approved in 1984, about 85,000 people worldwide have received cochlear implants.² However, data on the number of children with cochlear implants in Idaho is limited. According to ISDB, there were 38 students receiving outreach services during the 2004–05 school year who had cochlear implants and six students with cochlear implants enrolled in the campus residential or day programs. Data provided by Idaho’s cochlear implant team indicates that as of May 2005, there were about 66 cochlear implant users under the age of 18 in Idaho.³

¹ Cochlear implant approval by the US Food and Drug Administration occurs per model and company.

² Eric Sargent, MD, Associate Professor, Wayne State University, Michigan Ear Institute, “Cochlear Implants, Indications,” *eMedicine*, <http://www.emedicine.com/ent/topic424.htm>.

³ The cochlear implant team is a group of providers who collectively provide services to children receiving cochlear implants, including Dr. Jill Beck of Southwest Idaho Ear, Nose & Throat, providers from Idaho Elks Hospital, and an individual from Idaho State University.

Exhibit 5.2: Hearing with a Cochlear Implant

1. external speech processor captures sound and converts it into digital signals
2. processor sends digital signals to internal implant
3. internal implant converts signals into electrical energy, sending it to an electrode array inside the cochlea
4. electrodes stimulate hearing nerve, bypassing damaged hair cells, and the brain perceives signals; you hear sound

Source: Cochlear Corporation

Differing Views on Cochlear Implants

There are differing perspectives on cochlear implants in the deaf community. Some feel that cochlear implants are trying to overcome deafness rather than accepting it as natural. Some have concerns that, for various reasons, cochlear implants do not work for every child who receives one, thereby creating a situation of social isolation for the child who cannot communicate with hearing or other deaf and hard of hearing peers. An objection to cochlear implants, raised by the National Association of the Deaf, is that some children receiving implants are too young to choose this procedure for themselves.⁴

⁴ Lisa Samson-Fang, Marsha Simons-McCandless, and Clough Shelton, "Controversies in the Field of Hearing Impairment: Early Identification, Educational Methods, and Cochlear Implants," *Infants and Young Children* (April 2000): 84.

Availability and Costs of Cochlear Implantation

Availability of cochlear implants in Idaho is limited. Boise is the only place to offer this surgery. The closest cochlear implant centers in neighboring states are Spokane, Washington, and Salt Lake City, Utah. Children who receive cochlear implants in Boise are first evaluated by a cochlear implant team consisting of the doctors performing the surgery, a psychiatrist, and an audiologist, among others. This team continues to monitor cases and provide support services once the child has received a cochlear implant.

The total cost of a cochlear implant in Boise, including the device, surgery, hospital costs, and programming required after the device is implanted, is about \$40,000.⁵ Costs of cochlear implants elsewhere have been reported to be as much as \$60,000.⁶ When including costs for the device, procedure, and treatment for the first few years, the cost for a cochlear implant in Idaho can reach \$70,000.

Some insurance companies cover all of the costs of cochlear implants while some recipients may have to pay \$10,000 to \$20,000 out-of-pocket. According to a local physician, because insurers do not typically cover all of the costs associated with implantation, some hospitals are absorbing the non-reimbursed costs for the device and surgery.

A study by RAND Health questioned the accessibility of cochlear implants because much of the costs are not covered by insurance, particularly Medicaid and Medicare. Because about 30 percent of profoundly deaf individuals are covered by public insurance, RAND recommends changing Medicare and Medicaid policy to expand coverage for cochlear implants.⁷

Habilitative Services

Cochlear implants require an array of support services to ensure their success. These services have three components: medical, audiological, and educational. The surgeon on the Boise cochlear implant team described many of these services as social and supportive in nature. The early years in a child's development are critical for language development. Because of this, early detection of hearing loss and cochlear implantation when the child is young increases the likelihood of success with this technology. The role of parents and family in providing support is also important for success of cochlear implants.⁸

⁵ Jill Beck, M.D., Southwest Idaho Ear, Nose & Throat, e-mail communication with the Office of Performance Evaluations, 11 August 2005.

⁶ Paul Davies, "Aural Argument, Toddler's Implants Bring Upheaval to Deaf Education," *Wall Street Journal* 29 (March 2005).

⁷ RAND Health, "Low Levels of Insurance Reimbursement Impede Access to Cochlear Implants," *Research Highlights* RB-4532-1 (2002).

⁸ Ann Geers and Chris Brenner, "Background and Educational Characteristics of Prelingually Deaf Children Implanted by Five Years of Age," *Ear and Hearing* 24, no. 1 (February 2003): 4S.

After a child receives a cochlear implant, an audiologist uses computer software to program the implant by adjusting the sound level and programming the speech processor. According to the surgeon on the cochlear implant team, when a young child first receives the implant, the brain changes about every two weeks because it is processing new information he or she is detecting. As a result, adjustments to the programming of the implant must occur on a regular basis.

Some cochlear implant manufacturers and health care providers recommend auditory communication approaches to assist children with implants to develop speech and hearing. The two major types of auditory training are auditory-oral and auditory-verbal. Both methods are similar and teach the student how to interpret the amplified sound they are detecting. However, the auditory-oral method incorporates speech reading (also known as lip reading) while the auditory-verbal method does not. These services are often provided by speech-language pathologists, but there is a general shortage of these individuals in Idaho. In addition to formal services, it is also important that parents or caregivers at home work with the child regularly.

Neither of these auditory methods relies on sign language, although some students may learn sign language so they can communicate with those who do. ISDB staff informed us that many experts recommend sign language to support the auditory methods in the development of language and speech. Others believe there is more than one definition of an effective program for children with cochlear implants and that sign language can support the development of spoken language.⁹ One expert said that sign language can play an important role in children with cochlear implants to “bridge the new experience of sound with the familiar experience of visual language.”¹⁰

Mainstreaming and Benefits to Society

Some studies suggest children who receive cochlear implants and appropriate habilitative services early in life have greater improvement in speech than children who receive them later. Students who receive early services are more likely to be mainstreamed in regular classrooms, and because of their access to verbal communication, may experience the same level of achievement as their hearing peers.^{11, 12} According to researchers at Johns Hopkins University School of Medicine, “deaf young adults not in mainstream elementary and secondary

⁹ Debra Nussbaum and Susanne Scott, *Children with Cochlear Implants: Where Does Sign Language Fit In?* Cochlear Implant Education Center, Laurent Clerc National Deaf Center (Gallaudet University: March 2004).

¹⁰ Mary Koch, “Sign Language as a Bridge to Spoken Language,” Compilation of Handouts/PowerPoint Presentations (Gallaudet University: 2002), <http://clerccenter.gallaudet.edu/CIEC/conference-proceedings.html>.

¹¹ John Niparko and Rebecca Blankenhorn, “Cochlear Implants in Young Children,” *MRDD Research Reviews* 9 (2003): 273.

¹² Howard Francis, Mary Koch, Robert Wyatt, and John Niparko, “Trends in Educational Placement and Cost-Benefit Considerations in Children with Cochlear Implants,” *Arch Otolaryngol Head Neck Surg.* 125 (May 1999): 499.

schools are less likely to pursue postsecondary education and are more likely to be underemployed or unemployed.”¹³

According to the University of Miami School of Medicine, cochlear implants rank among the most cost-effective medical procedures. A 2000 study determined that cochlear implants can save society \$53,198 per child over a child’s lifetime.¹⁴ The Johns Hopkins University study estimated that cochlear implants could result in savings of \$30,000 to \$200,000 of educational and support service expenses from kindergarten through twelfth grade.¹⁵

ISDB Is Increasing Services for Students with Cochlear Implants

ISDB has been increasing its services to students with cochlear implants in recent years. Currently ISDB provides educational services to support students with cochlear implants on campus and in its cooperative program with the Meridian School District.

ISDB provided campus services to several students with cochlear implants during the 2004–05 school year. Services consisted of an audiologist working with these students several times per week according to each student’s individualized education program. ISDB also contracted for speech-language pathology services to help these students and hired a full-time speech-language pathologist for the 2005–06 school year.¹⁶

During the past three years, ISDB requested and received program development and mentoring services from the Public School Caucus, a division of the Alexander Graham Bell Association. Assistance included in-service training, guidelines for curriculum and assessment, auditory-oral materials, and information about conferences, seminars, and model programs. ISDB staff report the majority of mentoring and program development has been directed to the program in the Meridian School District, not at the ISDB campus. While

¹³ Howard Francis, Mary Koch, Robert Wyatt, and John Niparko, “Trends in Educational Placement and Cost-Benefit Considerations in Children with Cochlear Implants,” *Arch Otolaryngol Head Neck Surg* 125 (May 1999): 499.

¹⁴ André Cheng, Haya Rubin, Neil Powe, Nancy Mellon, Howard Francis, and John Niparko, “Cost-Utility Analysis of the Cochlear Implant in Children,” *Journal of the American Medical Association* 284, no. 7 (August 2000): 854.

¹⁵ Howard Francis, Mary Koch, Robert Wyatt, and John Niparko, “Trends in Educational Placement and Cost-Benefit Considerations in Children with Cochlear Implants,” *Arch of Otolaryngol Head Neck Surg*. 125 (May 1999): 499.

¹⁶ On campus, the audiologist and speech-language pathologist use the “Bringing Sounds to Life” curriculum (developed by Mary Koch) and the Daniel Ling strategies to teach speech production using some sign language. ISDB has stated it plans to integrate more of this work into the classroom.

acknowledging program improvements are needed, a representative of the Public School Caucus has commended ISDB for working as quickly as possible to build a quality auditory-oral program.

Certification in Auditory-Oral Communication Methods

A barrier to expanding services to children with cochlear implants in Idaho is a lack of instructors qualified in auditory-oral communication methods. A representative from the Public School Caucus characterizes the situation as a crisis because, as of last year, there were fewer than 200 certified auditory-verbal therapists nationwide and other states face the similar situation of not having teachers trained in the auditory-oral approach.¹⁷ To address this issue, some ISDB teachers have received training from the Tucker-Maxon Oral School in Portland, Oregon, and the Utah School for the Deaf.

There are no institutions in Idaho with teacher certification programs in auditory-oral education. However, staff working at the Boise Center of Idaho State University, Communication Sciences and Disorders and Education of the Deaf, told us they have provided training in oral education to some school districts and are willing to provide the same opportunities to ISDB.

ISDB staff report they have worked diligently to recruit qualified auditory-oral instructors by posting job announcements with the appropriate colleges and universities, but the relatively lower wages the school can offer is a deterrent. ISDB staff informed us of their intent to partner with the Boise School District, where the district would share one of its experienced speech-language pathologists to work with children who have cochlear implants. According to ISDB staff, the intent is for the speech-language pathologist to be available to the program in the Meridian School District and occasionally to outreach consultants and the ISDB campus.

ISDB Staff Views of Cochlear Implants

We interviewed more than 20 ISDB teachers, classroom aides, and cottage supervisors who work on campus about educational issues, including cochlear implants. In group setting interviews, teachers and aides expressed views on how cochlear implants may affect ISDB in at least two ways. First, cochlear implant technology may raise parent expectations, perhaps unrealistically, of student success. Second, it could potentially reduce enrollment in campus programs as students are successfully mainstreamed into public schools.

¹⁷ Correspondence from representatives of the Public School Caucus, Program Assistance Project, a division of the Alexander Graham Bell Association for the Deaf and Hard of Hearing to ISDB and parents of children receiving ISDB services, October and November, 2004.

Some ISDB teachers interviewed in the group setting expressed concerns that the school administration does not adequately guide the auditory-oral communication program. Some teachers also believed curriculum, including that for students with cochlear implants, was not purposefully developed and uniformly applied to ensure academic goals were met.

Some ISDB teachers we interviewed individually expressed opinions that cochlear implants do not work and that overall success rates of cochlear implants are very low. One teacher said, “The majority of [teaching] staff would say no to cochlear implants” and “sign language is the only approach that consistently works.” Another teacher said, “Cochlear implants do not always work, require a lot of therapy, and are not natural.” One former long-time ISDB teacher told us “if students want services for cochlear implants they would need to move out of state” and that some current ISDB staff do not like implants. ISDB staff views of the limited value of cochlear implants are a concern. The ISDB principal told us of the school’s desire to establish an auditory-oral program and hire staff who support and implement appropriate interventions.

Because program development assistance for cochlear implants and auditory-oral education has been directed primarily to outreach services and views of some staff could be a barrier to expansion of these services, we recommend the State Board of Education develop policies and procedures for ISDB regarding cochlear implants and oral education. For example, New Mexico has developed a position statement on cochlear implants that includes references to their cochlear implant advisory team, working relationships with several implant centers, and curriculum development.¹⁸ Further, the Alexander Graham Bell Association advocates the assignment of a certified auditory-oral administrator to direct a consistent auditory-oral philosophy and ensure proper methods of instruction are in place.¹⁹

Some Parents Have Lower Levels of Satisfaction and Desire More Auditory-Oral Educational Services

In each of the three parent survey groups (campus, outreach, and Meridian) we received feedback regarding instruction for students with cochlear implants. Respondents reported a generally lower level of satisfaction with this type of instruction when compared to other ISDB programs.

¹⁸ New Mexico School for the Deaf, “NMSD Position Statement on Cochlear Implants,” Publications, <http://www.nmsd.k12.nm.us/publications/publications.html>.

¹⁹ Public School Caucus, “Components of a Quality Auditory/Oral Program Checklist,” Alexander Graham Bell Association for the Deaf and Hard of Hearing, <http://www.agbell.org/docs/chklist.pdf>.

Lower levels of satisfaction with ISDB services were expressed by parents of children enrolled in the ISDB preschool, kindergarten, and first grade classes in the Meridian School District when compared to other ISDB programs. Dissatisfaction statements were characterized by concerns about lack of services, lower quality services, and commitment to auditory-oral education. Health care providers for children with cochlear implants have also articulated doubts about ISDB's commitment to provide quality auditory-oral education.

Outreach Parents

Parents of students served through the ISDB outreach program expressed generally high levels of satisfaction. However, dissatisfaction with some services was reported by a small number of parents. Four parents responded they would like more auditory-oral communication services. Some of their comments illustrate this dissatisfaction.

It is continually dissatisfying that ISDB refuses and resists creating and supporting oral services statewide. This is a misuse/unequal distribution of state funding for the deaf and hard of hearing. Cochlear implants and digital aids maximizing speech are great technological advances that must be complemented by appropriate oral educational programs.

ISDB needs at least as many if not more programs that are speaking/oral based as those that are sign based.

Preschool, Kindergarten, and First Grade Parents

The parents of the students attending the ISDB preschool, kindergarten, and first grade classes in the Meridian School District expressed both satisfaction and dissatisfaction with ISDB services. Three-fourths of the parents agreed that ISDB teachers in this program had the skills needed to work with their children. However, just over one-half of these respondents disagreed or strongly disagreed that the frequency of outreach consultants' contact was sufficient enough to meet their needs. Of these parents, dissatisfaction with ISDB or local school districts was evenly distributed.

Some parent responses provide further insight into their satisfaction or dissatisfaction.

I have been so amazed at the excitement in my son about education. I cannot think of anything [in this program] that should be changed.

It is currently impossible for ISDB to treat oral children the same as the sign language-based children because of ISDB's structure. There is overwhelming campus and outreach support for sign language and almost no support for auditory-oral habilitation. The funding structure obviously factors the one at the expense of the other and most of the deaf children in the state. Most parents in the past who have chosen cochlear implants have had to provide all education themselves or else move out of the state, which many have done.

I would like to see a little bit more excitement for the oral class and the benefits it can provide for these kids with cochlear implants. I would like to see these teachers become experts on how to teach kids with implants, but I feel you have to be a believer first.

An additional point of dissatisfaction voiced by parents during individual interviews was the limited educational opportunities provided by ISDB for *parents* of children with cochlear implants.

Some Neighboring States Have Private Auditory-Oral Communication Schools

Other states and private schools offer programs that provide auditory-oral education and related services. The arrangements include early childhood, preschool, and mainstreaming services for students and can serve as models for ISDB to consider. Currently Idaho does not have a private school for auditory-oral communication, but this type of school is found in neighboring states.

Listen and Talk, Washington

Listen and Talk, based in the state of Washington, is a private, nonprofit educational program. It provides a parent-infant program with home visits and play groups, a blended preschool program (includes both deaf and hard of hearing students and hearing students), one-on-one services to students, and consultations with mainstream teachers and service providers. The focus of the program is auditory-oral training and mainstreaming. The Washington School for the Deaf is in process of developing an agreement with this organization to provide auditory-oral education and serve children with cochlear implants.

Tucker-Maxon Oral School, Oregon

The Tucker-Maxon Oral School located in Portland, Oregon, offers a parent-infant program for children birth to three years old, a preschool program, an elementary program, and a mainstream program in which the school helps students transition to a neighborhood public school. The school also offers audiological, cochlear implant, speech and language, and assessment services. Tucker-Maxon is a private school that charges tuition to students who attend, but financial aid is available. According to the school's website, "no child has ever been denied admission to Tucker-Maxon because of financial need."

Recommendation

- 5.1: To clarify ISDB's intent to provide auditory-oral training to students with cochlear implants and to address parent dissatisfaction, the Idaho State Board of Education should develop policies and procedures for the school that address program vision and administration, teacher qualifications and training, and curriculum development. Input from parents and ISDB staff should be sought during policy development.

The costs of implementing this recommendation could vary depending on the extent to which the State Board of Education solicits information from parents, ISDB staff, and other experts. Implementation should be complete prior to the start of the 2006–07 school year.

Chapter 6

Future Directions

Many changes in recent years including decreased campus enrollment, increased demand for outreach services by school districts, and new technologies have placed the Idaho School for the Deaf and the Blind (ISDB) at a turning point of deciding how to best serve sensory-impaired students. Policymakers could choose one of two options for the future direction of the school:

- a. Incorporate OPE recommendations into the current service delivery model*
- b. Take a new direction requiring a different service delivery model*

Any significant change to ISDB's method of providing services should be accompanied by detailed analyses of how well students will be served, fiscal tradeoffs, facility use, and logistical constraints.

ISDB Is at a Turning Point for Many Reasons

ISDB is currently faced with many changes and challenges:

- Idaho statutes pertaining to ISDB need to be re-written to authorize needed programs and clarify ISDB's responsibilities.
- Enrollment at the ISDB campus has declined in nine of the last ten years and could decrease to approximately 60 students within three years.
- ISDB's 2004–05 school year cost per residential student was \$82,000. This cost will likely exceed \$100,000 within two years if enrollment continues to decline.
- ISDB currently has more staff than students on campus.
- ISDB campus facilities are being used at less than one-half capacity.
- Location of the ISDB campus has been identified as a barrier to teacher recruitment and retention.
- School districts report the demand for outreach services is *increasing* or about the same, and demand for residential services is *decreasing* or about the same.

- The demand for instruction of students with cochlear implants is increasing.

These changes and challenges have brought ISDB to a turning point of deciding how to best serve students in light of rising demand by school districts and rising costs per student. Exhibit 6.1 illustrates two options that include incorporating our recommendations into the current service delivery model, or choosing a new direction requiring a different service delivery model. Each of these options create several considerations for the Legislature and the State Board of Education as to how these options will affect students, parents, and ISDB administrators and teachers.

Current Practices with OPE Recommendations

Policymakers (the State Board of Education and the Legislature) may consider for ISDB to continue its current model of residential, day, and outreach services *and* implement our recommendations for improved services and management. With this option, we could expect the high satisfaction among parents and school district officials to remain stable or even increase. As reported in chapter 1, Idaho is one of 42 states funding and operating a school for sensory-impaired students and the model used by ISDB is common. However, this option does not address the issue of declining enrollment.

Potential New Directions

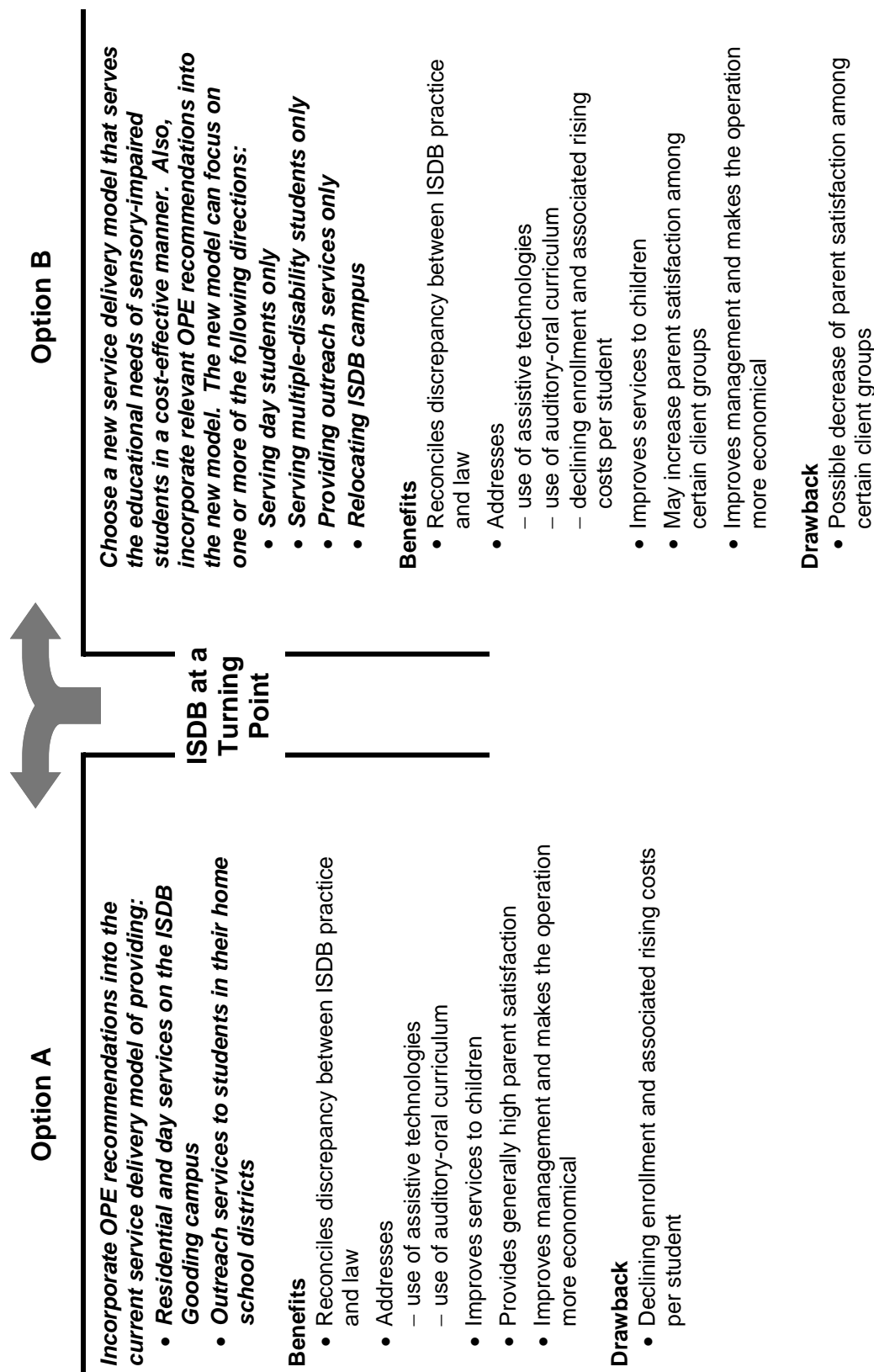
Policymakers may consider taking ISDB in a new direction of how to provide services to Idaho's sensory-impaired children. Other state schools for the deaf and blind have adapted to changes brought on by federal laws and declining enrollments, and their decisions resulted in new service delivery models. The four new directions outlined below have been identified by stakeholders during the course of this evaluation or have been considered or implemented by other states.

Day Students Only

Policymakers could close the residential portion of the school with an emphasis on educating day students only at the campus. This approach would reduce one of the more costly aspects of the school but would also eliminate a placement option for parents and school district officials. The former residential students would either need to be served in their home school districts or served as day students if the family lived close enough for daily busing. As of September 20, 2005, ISDB started the school year with 37 residential students from 25 different school districts. Fifteen of these students were from eight school districts in the Treasure Valley.

Some South Dakota policymakers are advocating this approach due to declining enrollments and are looking at foster home placement as a solution for the few remaining students who require residential services.

Exhibit 6.1: Options for the Idaho School for the Deaf and the Blind



Source: Office of Performance Evaluations

Multiple-Disability Students Only

Policymakers could choose for ISDB to provide services only to sensory-impaired students with multiple disabilities. Services could be provided on ISDB's campus, or other placements providing necessary care and education services could be explored. This approach would focus on those students who are most challenging for school districts to serve. As of September 20, 2005, ISDB reported serving 11 multiple-disability students on campus, including nine day students.

Providing services only to students with multiple disabilities would eliminate the campus option for the remaining 64 students who would need to be served by their home school districts with assistance from ISDB's regional outreach program. An official from the Wyoming Department of Education reported there is a national trend for state-operated schools to focus on students with multiple disabilities and mainstream other sensory-impaired students in local school districts. In Wyoming's case, the few deaf students needing residential services attend schools in either Colorado or Montana.

Outreach Services Only

Policymakers could choose for ISDB to focus its efforts only on outreach services to school districts from its regional offices, and eliminate both residential and day use options for individualized education program teams. This approach has the potential to shift state funds to many more students statewide, but would in part also be a cost shift to local school districts. It could pose significant challenges for some districts that are poorly equipped to serve sensory-impaired students.

A sufficient timeframe would need to be established for shifting the emphasis from campus services to ensure qualified educational sign language interpreters and teachers of Braille and orientation/mobility for visually-impaired students are available to districts.

Michigan, Nebraska, North Carolina, and Wyoming have taken this approach in recent years. Nevada has never had a state-operated school for the deaf and/or the blind and Alaska has never had a state-operated school for the blind. As explained in chapter 3, federal law does not require states to operate a residential or day-use facility for students who are sensory impaired.

Relocation of ISDB to an Urban Area

Relocation of ISDB to a larger population center is an option policymakers could consider. This option has been advocated by former ISDB students, the Idaho Council for the Deaf and Hard of Hearing, and the Idaho Commission for the Blind and Visually Impaired. These stakeholders believe a larger population center would offer more educational opportunities for students and possibly increase enrollment.

Advocates of this approach say students who are blind and visually impaired could benefit by additional opportunities to learn orientation and mobility skills, such as public transportation. Others said there are opportunities for students to visit museums, zoos, or the State Capitol more frequently than an occasional field trip. Some ISDB staff and special education advocates have said a larger population center could help improve recruitment and retention of quality teachers.

Further Considerations

This evaluation does not recommend a specific new direction for ISDB, but provides detailed assessments of its enrollment trends, current operations, and stakeholder satisfaction. Because sensory impairments are low incidence, vary in severity, and affected students are spread throughout Idaho, any new direction will include educational, fiscal, and logistical considerations. Therefore, we strongly encourage policymakers to first consider student needs and how well students will be served under any alternative model. Additional important considerations include uses of campus facilities, suitable alternative facilities, costs associated with different options, and school district capacity to provide appropriate services to sensory-impaired students.

Appendix A

Warranty Deed for Land Given to the State of Idaho by Former Governor Frank R. Gooding

WARRANTY DEED NO. 14464

This Indenture, Made this twentieth day of August in the year of our Lord one thousand nine hundred and nine between Frank R. Gooding and Amanda J. Gooding his wife of Gooding County of Lincoln State of Idaho the parties of the first part, and the State of Idaho the party of the second part, of County of State of Idaho the party of the second part,

Witnesseth, That the said parties of the first part, for and in consideration of the sum of One Dollar (\$1.00) DOLLARS, lawful money of the United States of America, to them in hand paid by the said party of the second part, the receipt whereof is hereby acknowledged, have granted, bargained and sold, and by these presents do grant, bargain, sell, convey and confirm unto the said party of the second part, and to its successors heirs and assigns forever, all the following described real estate, situated in Lincoln County, State of Idaho, to-wit:

Acreage Tracts Number one (1) and Number six (6) of South Gooding Acreage, containing Twenty (20) acres, more or less, as the same is platted in the official plat of South Gooding Acreage in said County and State, of record in the office of the County Recorder of said County, together with twenty (20) inches of the water right decreed to Ernest L. Woodward by the District Court of the Fourth Judicial District of Idaho at a term held at Hailey, County of Blaine, State of Idaho, June, One thousand Eight hundred and Ninety five Decree of Water right February 27, 1883.

The acreage tracts above described are decreed to "the State of Idaho" for the purpose of building and establishing its School for Deaf, Dumb and Blind. If the ground is not used for this purpose, or for some other State building or institution, this deed shall become Null and Void, and the property shall revert back to the parties of the first part, their heirs or assigns.

Together with all and singular the tenements, hereditaments and appurtenances thereunto belonging or in any wise appertaining, and the reversion and reversions, remainder and remainders, rents, issues and profits thereof, and all estate, right, title and interest in and to the said property, as well in law as in equity, of the said parties of the first part.

To Have and to Hold all and singular the above mentioned and described premises together with the appurtenances, unto the party of the second part, and to its heirs and assigns forever. And the said parties of the first part, and their heirs, the said premises in the quiet and peaceable possession of the said party of the second part, its heirs and assigns, against the said parties of the first part, and their heirs and against all and every person and persons whomsoever, lawfully claiming or to claim the same shall and will WARRANT and by these presents forever DEFEND.

In Witness Whereof, The said parties of the first part have hereunto set their hands and seals, the day and year first above written.

Signed, Sealed and Delivered in the Presence of

H. R. Ackley

Frank R. Gooding SEAL
Amanda J. Gooding SEAL
 SEAL
 SEAL

Source: Idaho School for the Deaf and the Blind.

Appendix B

Project Scope

Idaho School for the Deaf and the Blind

OFFICE OF PERFORMANCE EVALUATIONS

Project Scope

May 2005

In March 2005, the Joint Legislative Oversight Committee directed the Office of Performance Evaluations to begin an evaluation of the Idaho School for the Deaf and the Blind (ISDB). Idaho Code authorizes ISDB to serve deaf, hard of hearing, blind, and visually impaired students ages 6–21 at its residential campus located in Gooding. The State Board of Education serves as ISDB's board of trustees and provides general oversight.

As of February 2005, ISDB reported serving 80 students at the campus and over 600 hundred students in school districts through its seven regional outreach offices throughout Idaho. The Idaho Legislature appropriated ISDB \$7.88 million for fiscal year 2006; approximately the same budget as the previous year.

This evaluation will focus on the following questions:

- What are the current roles and responsibilities of ISDB? Are they consistent with state and federal laws, State Board of Education policies and procedures, and interagency agreements? How does ISDB's role compare to similar schools in other states?
- What are the enrollment characteristics and trends at ISDB's residential and outreach programs? What are the national enrollment trends?
- What residential and outreach services is ISDB providing and what are the annual costs of those services? What ISDB programming exists to prepare students for life following graduation?
- What services are other states providing for deaf and/or blind students? Do other states offer best practices or models that could benefit Idaho?
- How is ISDB addressing technologies such as cochlear implants and digital hearing aids? What are the costs and educational benefits of these technologies?
- What input can parents and school district officials offer regarding ISDB residential and outreach services?

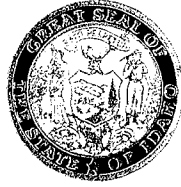
Appendix C

Evaluation Methodology

We used various methods to address the evaluation objectives:

- Reviewed applicable state and federal statutes and rules, State Board of Education policies, and interagency agreements ISDB had entered into with the State Department of Education and the Department of Health and Welfare.
- Surveyed 125 special education directors (105 school districts, 2 cooperatives representing 9 districts, and 18 charter schools). We received 107 responses resulting in an 86 percent response rate.
- Surveyed parents of students served through ISDB's campus programs and preschool, kindergarten, first grade program in Meridian to determine their level of satisfaction with services. We surveyed parents of *all* 77 students enrolled at ISDB's Gooding campus at the end of the 2004–05 school year and 21 parents of *all* students participating in the preschool, kindergarten, and first grade classes ISDB offers in the Meridian School District. We received 43 responses from campus parents resulting in a 56 percent response rate, and 13 responses from preschool, kindergarten, first grade parents resulting in a 62 percent response rate.
- We generated a random sample of 208 parents from a total population of 441 parents whose children were coded as receiving ISDB outreach services on at least a monthly basis or more frequently. Of this sample, we could not reconcile 11 addresses for parents who apparently moved and left no forwarding address. Therefore, our total random sample was of 197 parents, or 45 percent of the population. From the random sample, we received 101 responses resulting in a 51 percent response rate.
- ISDB identified parents in our sample most likely to speak Spanish as their first language. For those parents we had surveys translated into Spanish with the assistance of ISDB and the responses were translated by an Office of Performance Evaluations' consultant.
- Interviewed many members of ISDB staff and conducted group interviews with ISDB teachers and outreach workers.
- Surveyed neighboring and other states, including states with large geographic areas and populations of approximately two million or less (similar to Idaho), to obtain information about alternative approaches for serving students with hearing or visual impairments. We also reviewed literature regarding education of students who are sensory impaired.
- Reviewed information regarding cochlear implants and other assistive technologies, and interviewed a physician who performs cochlear implant surgeries in Idaho and other professionals who are knowledgeable about the technology and services needed for those receiving implants.

Responses to the Evaluation



DIRK KEMPTHORNE
GOVERNOR

September 27, 2005

Rakesh Mohan
Office of Performance Evaluations
STATEHOUSE MAIL
Boise, Idaho 83720

Dear Rakesh:

Thank you for the opportunity to respond to your recent review of the Idaho School for the Deaf and the Blind. Your report points out issues that will require serious debate in order to come to a proper course of action for the future of the school.

We plan to review your recommendations in conjunction with the recommendations of the State Board of Education Task Force on this same issue. Together the two reports will help guide the discussion on the direction the school should take.

Thank you again for the opportunity to respond to your report.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Whitlock", with a long horizontal flourish extending to the right.

Brian Whitlock
Chief of Staff

CC: Brad Foltman
Randy Tilley



IDAHO STATE BOARD OF EDUCATION

650 W. State Street • P.O. Box 83720 • Boise, ID 83720-0037
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e-mail: board@osbe.state.id.us

October 4, 2005

Rakesh Mohan, Director
Office of Performance Evaluations
Joe R. Williams Building
Lower Level, Suite 10
Boise, ID 83720-0055
Statehouse Mail

Dear Mr. Mohan:

On behalf of the State Board of Education (Board), I would like to thank you for the opportunity to participate in your study of the Idaho School for the Deaf and the Blind (ISDB). The courteous and thorough manner in which you and your staff conducted this review has certainly been a key to its successful outcome.

The Board appreciates the opportunity to comment on your study. Attached are the agency's initial comments. As you know, the Board has convened a committee to review the educational practices for students who are deaf or blind in Idaho and to make recommendations to the Board. This committee hopes to make its recommendations in December after a thorough review of your study. As a result, the Board would like the opportunity to present our committee recommendations at a Joint Legislative Oversight Committee meeting.

A copy of your report will be provided to all Board members for their review. Again, we appreciate your hard work in conducting this study.

Sincerely,

A handwritten signature in cursive script that reads "Marilyn Davis".

Marilyn Davis
Interim Executive Director

MD:ps

AGENCY COMMENTS:

Gretchen Spooner, Dir Curriculum & Special Services:

Chapter 3: Campus Services and Enrollment, "Reasons for Decline in Campus Enrollment"

The Idaho Special Education Interim Manual, 2005, Chapter 5 of the Manual, under "F. Other IEP Considerations", #6 Special Considerations, d. :

"The IEP team will consider the communication needs of the student. In the case of the student who is deaf or hard-of-hearing, the IEP team will consider the language needs of the student, opportunities *for direct communication with peers and professional personnel in the student's language and communication mode*, the student's academic level, and his full range of needs including *opportunities for direct instruction in the student's language and communication mode*." (p. 85) (emphasis mine)

This makes it clear that for students who use sign language, the LRE for that student must consider the communication needs and where they will find the most open and easy access to communication with peers and staff.

Carol Baron, Director of Blind/Visually Impaired Outreach:

Chapter 4: Outreach Services and Costs, Coding of Cases <H2>

Current definitions of "Active", "Consultive", "Referral" and "Monitor" (previously "Consultive 2") are as follows:

1. ACTIVE: ISDB Regional Consultant provides direct intervention on a regular basis to a student and his/her family and/or school as defined by the IFSP/IEP/504 Plan.
2. CONSULTIVE: ISDB Regional Consultant is the primary resource for B/VI or D/HH issues providing consultation to a school or other service agency/provider as defined by the IFSP/IEP/504 Plan.
3. REFERRAL: ISDB Regional Consultant is contacted by outside entity to determine eligibility for ISDB services and gathers documentation to determine eligibility and service category.
4. MONITOR: ISDB Regional Consultant maintains annual/as needed contact to review service plans with the school or other service agency serving Idaho students.

Based on current definitions, the order of codes for workload demand from highest demand to lowest demand as stated in this report is incorrect. Cases coded as "Referral" often constitute a greater workload demand than those coded as "Monitor" (previously Consultive 2) and should be listed in descending order as follows: "Active", "Consultive", "Referral" and "Monitor" to more accurately reflect one aspect of the "weighted approach".

Janet Stout, K-12 Principal:

Chapter 6: Future Directions, Outreach Services, paragraph 2

...Qualified educational sign language interpreters are critical; however, they are not certified teachers of the deaf.

Jeff Woods, Director of Financial Services:

In the "School District Costs" section, the report lists \$18,000 as the average cost to the Meridian School District to educate an elementary deaf student and between \$22,000 and \$25,000 to educate deaf students who are in middle school or high school. In several sections of the report, it is shown that the cost balances of educating students at the ISDB are approximately \$59,000 to educate a day student and approximately \$82,000 to educate a residential student. The ISDB strongly believes that the balances that are reported to educate deaf students in the Meridian School District and the ISDB are not true comparisons. The balance reported by the Meridian School District includes only personnel costs and the costs for audiological and orientation and mobility services. Whereas, the costs of \$59,000 and \$82,000 reported for the ISDB includes costs for maintenance of the campus, agency administration, residential services, food services and pupil transportation. Using the balances in this report for instruction and educational support would draw a true comparison with the balance reported by the Meridian School District. The cost of instruction and educational support in Exhibit 3.4 shows the cost of educating a day or residential student is \$37,706. The \$37,706 balance should be compared to the Meridian School District's costs of educating their deaf students, plus the \$3,016 average cost per outreach student the ISDB spends in assisting deaf and hard-of-hearing students in the Meridian School District. A true comparison would be ISDB's average of \$37,706 compared to Meridian School District's costs of \$21,016 to educate an elementary deaf student and between \$25,016 and \$28,016 to educate deaf students who are in middle school or high school.

OPE Comments to the Response of the State Board of Education

We agree that information in chapter 3 about ISDB's costs per student is not comparable to information about school district costs presented elsewhere in the report. We did not attempt to make such a comparison. This would have required a detailed review of school district services and accounting information that was beyond the time available for this project. Anecdotal information about costs specifically relating to serving sensory-impaired students is provided solely to demonstrate that district costs can be substantial and vary depending on the extent of the disability.

ISDB's suggestion of a true comparison of costs is limited for two reasons. First, it does not take into account costs for administration, food services, maintenance, pupil transportation, or residential services. At ISDB, these costs account for approximately 48 percent of total campus expenses. Second, its approach focuses on a single school district that may not be representative of district costs in general.

We acknowledge ISDB's recent case code definition change and have incorporated it into the report.

Office of Performance Evaluations Reports Completed 2002–Present

Publication numbers ending with “F” are follow-up reports of previous evaluations. Publication numbers ending with three letters are federal mandate reviews; the letters indicate the legislative committee that requested the report.

<u>Pub. #</u>	<u>Report Title</u>	<u>Date Released</u>
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02-02	Management of State Agency Passenger Vehicles: A Follow-up Review	November 2002
02-03	A Review of the Idaho Child Care Program	November 2002
03-01HHW	Return of Unused Medications from Assisted Living Facilities	January 2003
03-01F	Agency Response to <i>Management of State Agency Passenger Vehicles: A Follow-up Review</i>	February 2003
03-01	Programs for Incarcerated Mothers	February 2003
03-02F	The Department of Environmental Quality: Timeliness and Funding of Air Quality Permitting Program	February 2003
03-03F	Data Management at the Commission of Pardons and Parole and the Department of Correction	February 2003
03-02	Overview of School District Revenues and Expenditures	April 2003
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04-02F	Public Works Contractor Licensing Function	March 2004
04-03F	Timeliness and Funding of Air Quality Permitting Programs	June 2004
04-04F	Idaho Child Care Program	June 2004
04-05F	Idaho's Medicaid Program	June 2004
04-04	Strategic Planning and Performance Measurement	December 2004
05-01	Public Education Technology Initiatives	January 2005
05-02	Child Welfare Caseload Management	February 2005
05-01HTD	Use of Social Security Numbers for Drivers' Licenses, Permits and Identification Cards	February 2005
05-01F	Management of Correctional Data	March 2005
05-03	Idaho School for the Deaf and the Blind	October 2005

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